

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

AVENGER FLIGHT GROUP, LLC, *et al.*,

Debtors.¹

Chapter 11

Case No. 26-10183 (MFW)

(Jointly Administered)

Objection Deadline: March 17, 2026 at 4:00 p.m. (ET)
Hearing Date: March 24, 2026 at 3:00 p.m. (ET)

**DEBTORS' MOTION FOR ENTRY OF AN ORDER:
(I) SETTING BAR DATES FOR FILING PROOFS OF CLAIM, INCLUDING
REQUESTS FOR PAYMENT UNDER SECTION 503(b)(9) OF THE BANKRUPTCY
CODE; (II) SETTING A BAR DATE FOR THE FILING OF PROOFS
OF CLAIM BY GOVERNMENTAL UNITS; (III) SETTING A BAR DATE
FOR THE FILING OF REQUESTS FOR ALLOWANCE OF ADMINISTRATIVE
EXPENSE CLAIMS; (IV) ESTABLISHING AN AMENDED SCHEDULES BAR DATE
AND A REJECTION DAMAGES BAR DATE; (V) APPROVING THE FORM OF
AND MANNER FOR FILING PROOFS OF CLAIM; (VI) APPROVING A NOTICE
OF BAR DATES; AND (VII) GRANTING RELATED RELIEF**

The above-captioned debtors and debtors in possession (the “Debtors”) respectfully state the following in support of this motion (the “Motion”):

Relief Requested

1. The Debtors seek entry of an order (the “Bar Date Order”), substantially in the form attached hereto as **Exhibit A**: (a) establishing **April 30, 2026 at 5:00 p.m., prevailing**

¹ The Debtors in these chapter 11 cases and the last four digits of their respective federal tax identification numbers are: Avenger Flight Group, LLC (1216); AFG Dallas III, LLC (5615); AFG Dallas IV, LLC (5558); AFG Dallas, LLC (3418); AFG EU Operations Corp. (9406); AFG FLL, LLC (6470); AFG Latam Holding Corp. (6475); AFG Latam Sim Holdings II, LLC (0473); AFG Latam Sim Holdings III, LLC (2592); AFG Latam Sim Holdings IV, LLC (0093); AFG Latam Sim Holdings, LLC (6475); AFG Latam, LLC (9545); AFG Mexico Corp. (1402); AFG Orlando, LLC (8409); AFG Sanford, LLC (6661); AFG Sim Holding Corp. (3325); Avenger Flight Group Europe, Corp. (5908); Avenger Flight Group Topco, LLC (5643); Avenger Flight Training, LLC (5640); Avenger Flight Group Mexico II, S. de R.L. de C.V, (N/A); and Papi Flight Training, LLC (6206). The location of the Debtors’ corporate headquarters and the Debtors’ service address is Avenger Flight Group LLC, 1450 Lee Wagener Blvd., Fort Lauderdale, FL 33315.



Eastern Time, as the last date and time for each person or entity² (including, without limitation, individuals, partnerships, corporations, joint ventures, estates, and trusts) to file proofs of claim (collectively, “Proofs of Claim”) based on prepetition claims against any Debtor (the “Claims Bar Date”); (b) solely as to governmental units (as defined in section 101(27) of the Bankruptcy Code), establishing **August 11, 2026 at 5:00 p.m., prevailing Eastern Time**, as the last date and time for each such governmental unit to file Proofs of Claim against any Debtor (the “Governmental Bar Date”); (c) establishing a bar date for the filing of requests for payment of certain administrative claims (other than claims pursuant to section 503(b)(9) of the Bankruptcy Code) (the “Administrative Claims Bar Date,” and, together with the Claims Bar Date and Governmental Bar Date, the “Bar Dates” or “Bar Date,” as applicable); (d) establishing the Amended Schedules Bar Date and Rejection Damages Bar Date (as each term is defined herein); (e) approving the proposed Proof of Claim Form (as defined herein); (f) approving the proposed Bar Date Notice (as defined herein); (g) approving the proposed form of Publication Notice (as defined herein); and (h) granting related relief.

Jurisdiction and Venue

2. The United States District Court for the District of Delaware has jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to the United States Bankruptcy Court for the District of Delaware (the “Court”) under 28 U.S.C. § 157 pursuant to the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012. This matter is a core proceeding within the meaning of 28 U.S.C.

² Except as otherwise defined herein, all terms specifically defined in the Bankruptcy Code have those meanings ascribed to them by the Bankruptcy Code. In particular, as used herein: (a) the term “claim” has the meaning given to it in section 101(5) of the Bankruptcy Code; (b) the term “entity” has the meaning given to it in section 101(15) of the Bankruptcy Code; (c) the term “governmental unit” has the meaning given to it in section 101(27) of the Bankruptcy Code; and (d) the term “person” has the meaning given to it in section 101(41) of the Bankruptcy Code.

§ 157(b)(2), and the Debtors confirm their consent pursuant to Rule 9013-1(f) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”) to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

3. Venue in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The bases for the relief requested herein are sections 105(a), 501, 502, and 1111(a) of the Bankruptcy Code, Rules 2002(a)(7), (f), (l), 3003(c), and 5005(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Local Rules 1009-2 and 2002-1, and 3001-1.

Background

5. On February 11, 2026 (the “Petition Date”), each Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtors are operating their business and managing their property as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. On February 13, 2026, the Court entered an order [Docket No. 54] authorizing the procedural consolidation and joint administration of these chapter 11 cases pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1.

6. On February 25, 2026, the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed an official committee of unsecured creditors (“Committee”). No request for the appointment of a trustee or examiner has been made in these chapter 11 cases.

7. On February 13, 2026, the Court entered its *Interim Order (I) Authorizing the Debtors to Obtain Senior Secured Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status,*

(IV) Granting Adequate Protection, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Docket No. 59] (the “Interim DIP Order”). Among other things, the Interim DIP Order approved, on an interim basis, certain Milestones specified in Exhibit B thereto, in connection with the interim approval of, *inter alia*, the DIP Facility from the DIP Secured Parties, including the establishment of a deadline of 60 calendar days after the Petition Date (i.e. April 12, 2026) (the “Outside Closing Date”) for closing of sale of all or substantially all assets.

8. On February 12, 2026, the Debtors filed the *Motion of the Debtors for (I) An Order (A) Approving Bid Procedures for the Sale of Substantially of the Debtors’ Assets; (B) Approving the Contract and Lease Procedures in Connection with a Sale or Other Transaction; (C) Approving Certain Bid Protections in Connection with the Debtors’ Entry Into Stalking Horse APA; (D) Scheduling The Auction and Sale Hearing; (E) Approving the Form and Manner of Notice Thereof; and (F) Granting Related Relief; and (II) An Order or Orders (A) Approving the Sale of the Debtors’ Assets Free and Clear of All Encumbrances; and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases* [Docket No. 13] (the “Sale Motion”). A hearing to consider entry of the Bid Procedures Order (as defined in the Sale Motion) is set to be conducted on March 11, 2026, at 11:30 a.m. (prevailing Eastern Time).

9. On March 6, 2026, the Court entered its *Order (I) Extending Time to File Schedules of Assets and Liabilities and Statement of Financial Affairs and Rule 2015.3 Financial Reports, and (II) Granting Related Relief* [Docket No. 126] (the “Schedules Extension Order”). As more fully set forth therein, the Schedules Extension Order extends the deadline by which the Debtors must file their schedules of assets and liabilities and statements of financial affairs (collectively, the “Schedules”) to March 27, 2026 (the “Schedules Filing Deadline”).

10. The statutory meeting of creditors under section 341 of the Bankruptcy Code is set to be conducted on March 12, 2026.

The Bar Dates

I. Summary

11. Bankruptcy Rule 3003(c)(3) provides that the Court shall fix the time within which Proofs of Claim must be filed in a chapter 11 case pursuant to section 501 of the Bankruptcy Code. Moreover, Bankruptcy Rule 3003(c)(2) provides that any creditor who has a claim against the Debtors that arose prior to the Petition Date, and whose claim is not scheduled in the Debtors' Schedules or whose claim is listed on the Schedules as disputed, contingent, or unliquidated, must file a Proof of Claim. Section 502(b)(9) of the Bankruptcy Code further provides that governmental units shall have a minimum of 180 days after the entry of the order for relief to file Proofs of Claim.

12. The Debtors propose to allow creditors (including those with certain Administrative Claims) until April 30, 2026, at 5:00 p.m., prevailing Eastern Time, to file Proofs of Claim. The Debtors respectfully submit that the proposed timeline will give all parties in interest adequate notice of the Bar Dates and an opportunity to respond.

II. The Claims Bar Date

13. The Debtors request that the Court establish **April 30, 2026, at 5:00 p.m., prevailing Eastern Time**, as the Claims Bar Date. The Claims Bar Date would be the date by which all entities, other than governmental units holding prepetition claims, must file Proofs of Claim, including requests for payment under section 503(b)(9) of the Bankruptcy Code, so that such Proofs of Claim are actually received by the Debtors' notice and claims agent, Kurtzman Carson Consultants, LLC dba Verita Global ("Verita"), by the Claims Bar Date, unless such person's or entity's claim falls within one of the exceptions set forth in this Motion. Subject to

these exceptions, the Claims Bar Date would apply to all claims against the Debtors that arose or are deemed to have arisen prior to the Petition Date, including secured claims, unsecured priority claims, unsecured non-priority claims, and rejection damages claims for executory contracts and unexpired leases that have already been rejected by order of the Court in these Chapter 11 Cases.

14. Separately, and unless otherwise ordered by the Court, the Debtors request that the Court establish a bar date for filing claims arising from the rejection of executory contracts and unexpired leases of the Debtors as the later of: (a) the Claims Bar Date; (b) **5:00 p.m. prevailing Eastern Time** on the date that is **thirty (30) days** following entry of an order approving the rejection of the applicable executory contract or unexpired lease of the Debtors; and (c) any date that the Court may fix in the applicable order approving such rejection (any such date, a “Rejection Damages Bar Date”).

III. The Governmental Bar Date

15. Section 502(b)(9) of the Bankruptcy Code provides, in relevant part, that “[a] claim of a governmental unit shall be timely filed if it is filed before one hundred and eighty (180) days after the date of the order for relief or such later time as the [Bankruptcy Rules] may provide” 11 U.S.C. § 502(b)(9). Therefore, the Debtors request that **August 11, 2026 at 5:00 p.m., prevailing Eastern Time**, be established as the Governmental Bar Date in these Chapter 11 Cases. The Governmental Bar Date would apply to all governmental units holding claims against the Debtors (whether secured, unsecured priority, or unsecured non-priority) that arose or are deemed to have arisen prior to the Petition Date, including governmental units with claims against the Debtors for unpaid taxes, whether such claims arise from prepetition tax years or periods or prepetition transactions to which the Debtors were a party. All governmental units holding such claims against the Debtors would be required to file Proofs of Claim so that such Proofs of Claim

are actually received by the Debtors' notice and claims agent, Verita, by the Governmental Bar Date.

IV. Administrative Claims Bar Date

16. Section 503(a) of the Bankruptcy Code provides that “[a]n entity may timely file a request for payment of an administrative expense, or may tardily file such request if permitted by the court for cause.” 11 U.S.C. § 503(a). Therefore, the Debtors request that **April 30, 2026 at 5:00 p.m., prevailing Eastern Time**, be established as the Administrative Claims Bar Date in these chapter 11 cases. The Administrative Claims Bar Date will apply to all Administrative Claims that arose or are deemed to have arisen on or prior to April 14, 2026 (the “Administrative Claims Deadline”) (excluding claims for fees and expenses of professionals retained in these proceedings and claims asserting priority pursuant to section 503(b)(9) of the Bankruptcy Code), which is two days following the Outside Closing Date. All claimants holding Administrative Claims³ against the Debtors would be required to file with the Court on or before the Administrative Claims Bar Date a request for payment of such Administrative Claim and, if desired, a notice of hearing on such Administrative Claim.

V. Amended Schedules Bar Date

17. In accordance with Local Rule 1009-2, in the event that the Debtors file a previously unfiled Schedule or further amend or supplement their Schedules after having given notice of the Bar Dates, the Debtors propose that, with respect to holders of claims affected thereby, the Court establish the later of: (a) the Claims Bar Date or the Governmental Bar Date, as applicable, for such claims; and (b) **5:00 p.m. prevailing Eastern Time** on the date that is

³ As inserted herein, “Administrative Claims” means those claims under sections 503(b) or 507(a)(2) of the Bankruptcy Code (excluding claims for fees and expenses of professionals retained in these Chapter 11 Cases and claims asserting priority pursuant to section 503(b)(9) of the Bankruptcy Code).

thirty (30) days from the date on which the Debtors provide notice of the filing, amendment, or supplement to the Schedules, as the deadline by which claimants holding such claims must file Proofs of Claim with respect to such claims so that such Proofs of Claim are actually received by the Debtors' notice and claims agent, Verita, by such date (any such date, an "Amended Schedules Bar Date"). Notice of the Amended Schedules Bar Date shall be sent to each claimant holding a claim affected by any such filing, amendment, or supplement and shall: (a) describe the listing and treatment of such claim on the Schedules, including how such treatment has changed, if applicable; and (b) indicate the Amended Schedules Bar Date for such claim.

Procedures for Filing Proofs of Claim and Administrative Claims

I. Parties Required to File Proofs of Claim and Administrative Claims

18. Except as otherwise set forth herein, the Debtors propose that the following entities holding claims against the Debtors that arose or are deemed to have arisen prior to the Petition Date be required to file Proofs of Claim or requests for payment of Administrative Claims arising prior to the Administrative Claims Deadline on or before the applicable Bar Date:

- a. any person or entity whose claim against a Debtor is not listed in the applicable Debtor's Schedules or is listed in such Schedules as "contingent," "unliquidated," or "disputed" if such person or entity desires to participate in any of these chapter 11 cases or share in any distribution in any of these chapter 11 cases;
- b. any person or entity who believes that its claim is improperly classified in the Schedules or is listed in an incorrect amount and who desires to have its claim allowed in a different classification or amount other than that identified in the Schedules;
- c. any person or entity who believes that its prepetition claim as listed in the Schedules is not an obligation of the specific Debtor against which the claim is listed and that desires to have its claim allowed against a Debtor other than that identified in the Schedules;
- d. any person or entity who believes that its claim against a Debtor is or may be an administrative expense that arises or is deemed to have arisen on or prior to the Administrative Claims Deadline (excluding

claims for fees and expenses of professionals retained in these proceedings and claims asserting priority pursuant to section 503(b)(9) of the Bankruptcy Code);

- e. any entity who believes that its claim against a Debtor is or may be entitled to priority under section 503(b)(9) of the Bankruptcy Code; and
- f. any person or entity who believes that its claim against a Debtor is or may be entitled to priority under 507(a)(7) of the Bankruptcy Code, including individuals with claims arising from the deposit of money in connection with the purchase of property that was not delivered or provided, and for which the individual has not received a refund of such deposit from any third party.

II. Parties Not Required to File Claims by the Claims Bar Date

19. The Debtors propose that the following persons or entities whose claims otherwise would be subject to the Claims Bar Date need not file Proofs of Claim or requests for payment of Administrative Claims that arose or are deemed to have arisen prior to the Administrative Claims Deadline:

- a. any person or entity who has already filed a signed Proof of Claim against the respective Debtor(s) with the Clerk of the Court or with Verita in a form substantially similar to Official Form 410;
- b. any person or entity whose claim is listed on the Schedules if: (i) the claim is *not* scheduled as any of “disputed,” “contingent,” or “unliquidated”; (ii) such person or entity agrees with the amount, nature, and priority of the claim as set forth in the Schedules; and (iii) such person or entity does not dispute that its claim is an obligation only of the specific Debtor against which the claim is listed in the Schedules;
- c. any person or entity whose claim has previously been allowed by order of the Court;
- d. any person or entity whose claim has been paid in full by the Debtors pursuant to the Bankruptcy Code or in accordance with an order of the Court;
- e. any Debtor having a claim against another Debtor;
- f. any Debtor having a claim against any of the Debtors’ affiliates;

- g. any counterparty to a non-residential real property lease that is assumed or assumed and assigned pursuant to section 365 of the Bankruptcy Code;
- h. any landlord counterparty of an executory contract of an unexpired non-real property lease where the lease has not yet been rejected as of the Claims Bar Date or Administrative Bar Date; provided that, for the avoidance of doubt, if a landlord counterparty's lease is rejected, the deadline for filing claims established under the applicable rejection order shall apply to all claims arising under the lease in question, including Administrative Claims, and entities holding such claims shall not be required to file a Proof of Claim with respect to prepetition amounts or an Administrative Claim with respect to postpetition amounts unless and until such unexpired lease has been rejected;
- i. any person or entity holding a claim for which a separate deadline is fixed by this Court;
- j. any person or entity holding a claim for fees and expenses of professionals retained in these Chapter 11 Cases;
- k. claims of the U.S. Trustee for quarterly fees; and
- l. pursuant to paragraph 41 of the Interim DIP Order or any corresponding paragraph contained in the Final Order (as defined in the Interim DIP Order), the DIP Secured Parties or any of the Prepetition Term Loan Secured Parties (as defined in the Interim DIP Order).

III. Form of Proof of Claim

20. The Debtors have prepared, and request that the Court approve, a form for filing a Proof of Claim which, although based on Official Form 410, has been modified to allow creditors to request payment for claims under section 503(b)(9) of the Bankruptcy Code substantially in the form of **Exhibit B** attached hereto (the "Proof of Claim Form"). In addition, with the assistance of its notice and claims agent, Verita, the Debtors propose to provide each of the creditors listed on the Debtors' Schedules and, upon any filing, amendment, or supplement to the Debtors' Schedules, each of the creditors affected by such filing, amendment, or supplement with a "personalized" Proof of Claim Form, which will indicate how the Debtors have scheduled

the creditor's claim in the Schedules, including: (a) the identity of the Debtor against which the creditor's claim is scheduled; (b) the amount of the scheduled claim, if any; (c) whether the claim is listed as contingent, unliquidated, or disputed; and (d) whether the claim is listed as secured, unsecured priority, or unsecured non-priority.

21. If the creditor disagrees with any of the information set forth on the "personalized" Proof of Claim Form, the creditor is required to file timely a Proof of Claim identifying the Debtor against which the creditor is asserting a claim and the amount and type of such claim on or before the applicable Bar Date or Amended Schedules Bar Date. Additionally, creditors may choose not to use the personalized Proof of Claim Form and instead submit Proofs of Claim on Official Form 410.

IV. Requirements for Preparing and Filing Proofs of Claim

22. With respect to preparing and filing a Proof of Claim, the Debtors propose that each Proof of Claim be required to be consistent with the following:

- a. **Contents.** Each Proof of Claim must: (i) be written in English; (ii) include a claim amount denominated in United States dollars; (iii) conform substantially with the Proof of Claim Form provided by the Debtors or Official Form 410; and (iv) be signed by the claimant or by an authorized agent or legal representative of the claimant.
- b. **Section 503(b)(9) Claim.** Any Proof of Claim asserting a claim entitled to priority under section 503(b)(9) must also: (i) include the value of the goods delivered to and received by the Debtors in the twenty (20) days prior to the Petition Date; (ii) attach any documentation identifying the particular invoices for which the section 503(b)(9) claim is being asserted; and (iii) attach documentation of any reclamation demand made to the Debtors under section 546(c) of the Bankruptcy Code (if applicable).
- c. **Section 507(a)(7) Claim.** Any Proof of Claim asserting a customer deposit claim entitled to priority under section 507(a)(7) must also include the total value of the deposit paid prior to the Petition Date and attach documentation supporting proof of the purchase.

- d. ***Original Signatures Required.*** Only ***original*** Proofs of Claim may be deemed acceptable for purposes of claims administration. Copies of Proofs of Claim or Proofs of Claim sent by facsimile or electronic mail will not be accepted, provided, however, that Proofs of Claim filed through the electronic interface provided by the Debtors' claims agent are deemed to be filed with original signatures.
- e. ***Identification of the Debtor Entity.*** Each Proof of Claim must clearly identify the Debtor against which a claim is asserted, including the individual Debtor's case number. A Proof of Claim filed under the joint administration case number or otherwise without identifying a specific Debtor will be deemed as filed only against Avenger Flight Group, LLC.
- f. ***Claim Against Multiple Debtor Entities.*** Unless otherwise ordered by the Court, each Proof of Claim must state a claim against ***only one*** Debtor and clearly indicate the Debtor against which the claim is asserted. To the extent that more than one Debtor is listed on the Proof of Claim, such claim may be treated as if filed only against the first-listed Debtor.
- g. ***Supporting Documentation.*** Each Proof of Claim must include supporting documentation in accordance with Bankruptcy Rules 3001(c) and (d). However, if such documentation is voluminous, such Proof of Claim may include a summary of such documentation or an explanation as to why such documentation is not available; *provided* that any creditor that includes a summary shall be required to transmit such documentation to the Debtors' counsel upon request no later than ten days from the date of such request.
- h. ***Timely Service.*** Each Proof of Claim must be filed, including supporting documentation, so as to be ***actually received*** by Verita on or before the applicable Bar Date (or, where applicable, on or before any other bar date as established by order of the Court), either: (1) electronically through the interface at <https://www.veritaglobal.net/avengerfg>; or (2) by first-class or overnight U.S. mail, or by other hand delivery system, at the following address:

**Avenger Claims Processing Center
c/o KCC dba Verita
222 N. Pacific Coast Highway, Suite 300
El Segundo, CA 90245**

PROOFS OF CLAIM SUBMITTED BY FACSIMILE OR ELECTRONIC MAIL WILL NOT BE ACCEPTED.

- i. ***Receipt of Service.*** Claimants wishing to receive acknowledgment that their Proofs of Claim were received by Verita must submit: (i) a copy of the Proof of Claim Form (in addition to the original Proof of Claim Form sent to Verita); and (ii) a self-addressed, stamped envelope.

Consequences of Failure to File a Proof of Claim

23. Pursuant to Bankruptcy Rule 3003(c)(2), upon a confirmed chapter 11 plan becoming effective, the Debtors propose that any person or entity who is required, but fails, to file a Proof of Claim or an Administrative Claim in accordance with the Bar Date Order on or before the applicable Bar Date shall be forever barred, estopped, and enjoined from asserting such claim against the Debtors (or filing a Proof of Claim or an Administrative Claim arising prior to the Administrative Claims Deadline with respect thereto), and the Debtors and their property shall be forever discharged from any and all indebtedness or liability with respect to or arising from such claim, including with respect to claims asserting priority pursuant to section 503(b)(9) of the Bankruptcy Code. Moreover, such creditor shall be prohibited from voting to accept or reject any plan filed in these chapter 11 cases, participating in any distribution in these chapter 11 cases on account of such claim, or receiving further notices regarding such claim.

Procedures for Providing Notice of the Bar Dates

24. The Debtors propose the following procedures for providing mailing and publication notice of the Bar Dates.

I. Mailing of Bar Date Notices

25. Pursuant to Bankruptcy Rule 2002(a)(7), the Debtors propose to cause written notice of the Bar Dates, substantially in the form of **Exhibit C** attached hereto (the “Bar Date Notice”), and a Proof of Claim Form (collectively, the “Bar Date Package”) to be mailed via first-class mail, no later than three (3) business days after the Schedules Filing Deadline, to the following entities:

- a. the U.S. Trustee;
- b. Wilkie Farr & Gallagher LLP as counsel to the Committee;
- c. Womble Bond Dickinson as co-counsel to the Committee;
- d. all known creditors and other known holders of claims against the Debtors, including all entities listed in the Schedules as holding claims against the Debtors;
- e. all entities that have requested notice of the proceedings in these chapter 11 cases pursuant to Bankruptcy Rule 2002 as of the date of the Bar Date Order;
- f. all entities that have filed proofs of claim in these chapter 11 cases as of the date of the Bar Date Order;
- g. all known non-Debtor equity and interest holders of the Debtors as of the date the Bar Date Order is entered (whose Bar Date Package shall not contain a Proof of Claim Form);
- h. all known entities who are parties to executory contracts and unexpired leases with the Debtors;
- i. all known entities who are parties to litigation with the Debtors and their counsel of record (if known);
- j. all persons and entities known by the Debtors to have asserted any lien, claim, interest or encumbrance against the Debtors’ assets;
- k. all current and former employees of the Debtors from the past two years (to the extent that contact information for former employees is available in the Debtors’ records);
- l. all regulatory authorities that regulate the Debtors’ businesses, including environmental and permitting authorities;

- m. all applicable federal, state, and local taxing authorities;
- n. the Office of the Attorney General for the State of Delaware;
- o. the office of the attorney general for each state in which the Debtors maintain or conduct business;
- p. the District Director of the Internal Revenue Service for the District of Delaware; and
- q. the United States Attorney's Office for the District of Delaware.

26. The proposed Bar Date Notice notifies the parties of the Bar Dates and contains information regarding who must file a Proof of Claim or Administrative Claim, the procedures for filing a Proof of Claim or Administrative Claim, and the consequences of failure to file timely a Proof of Claim or Administrative Claim. The Debtors request that the Court approve the use of the Bar Date Notice.

II. Supplemental Mailings

27. After the initial mailing of the Bar Date Package, the Debtors may, in their discretion and after consultation with the Committee, make supplemental mailings of notices, including in the event that: (a) notices are returned by the post office with forwarding addresses;⁴ (b) certain parties, acting on behalf of parties in interest (*e.g.*, banks and brokers with respect to equity or interest holders), decline to pass along notices to these parties and instead return their names and addresses to the Debtors for direct mailing; and (c) additional potential claimants become known as a result of the Bar Date noticing process. In this regard, the Debtors request that the Court permit them to make supplemental mailings of the Bar Date Package in these and similar circumstances at any time up to thirty (30) days in advance of the applicable Bar Date, with any such mailings deemed timely and the Bar Date being applicable to the recipient creditors.

⁴ However, if notices are returned as "return to sender" without a forwarding address, the Debtors respectfully request that they should not be required to mail additional notices to such entities or persons.

III. Publication Notice

28. In the interest of ensuring that all potential claimants receive adequate notice of the Bar Dates, in addition to providing the Bar Date Notice to known creditors, the Debtors propose to provide notice of the Bar Dates by publication. The Debtors propose to publish the Bar Date Notice in accordance with Bankruptcy Rule 2002(1), modified for publication in substantially the form of **Exhibit D** attached hereto (the “Publication Notice”), on one occasion in the national edition of *The New York Times* or other paper of similar national circulation or before a date at least thirty (30) days before the Claims Bar Date.

29. The proposed Publication Notice includes a telephone number that creditors may call to obtain copies of the Proof of Claim Form, the URL for a website at which creditors may obtain a copy of a Proof of Claim Form, and information concerning the procedures and appropriate deadlines for filing Proofs of Claim and Administrative Claims.

Basis for Relief

IV. Ample Authority Exists to Approve the Bar Dates and the Proposed Procedures for Filing Proofs of Claim and Administrative Claims in These Chapter 11 Cases.

30. Bankruptcy Rule 3003(c)(3) generally governs the filing of proofs of claim in a chapter 11 case and provides, in relevant part, that “[t]he court shall fix and for cause shown may extend the time within which proofs of claim or interest may be filed.” Fed. R. Bankr. P. 3003(c)(3). Although Bankruptcy Rule 2002(a)(7) generally provides that all parties in interest must receive, at a minimum, twenty-one (21) days’ notice of the time fixed for filing proofs of claim pursuant to Bankruptcy Rule 3003(c), neither the Bankruptcy Code, the Bankruptcy Rules, nor the Local Rules specify a time by which proofs of claim must be filed in chapter 11 cases (other than section 502(b)(9) of the Bankruptcy Code relating to governmental units).

31. It is well-recognized that the claims bar date plays an essential role in the twin goals of bankruptcy—preserving a debtor’s going-concern value and maximizing property available to satisfy creditors. *See Bank of Am. Nat’l Trust & Sav. Assoc. v. 203 N. LaSalle St. P’ship*, 526 U.S. 434, 453 (1999). The claims bar date allows the debtor and parties in interest to determine and evaluate expeditiously the liabilities of the estate. The absence of such a deadline, in contrast, would prolong creditor uncertainty, increase the costs and expenses incurred by debtors in connection with the claims reconciliation process, and delay or even derail the claims process, thus undercutting one of the principal purposes of bankruptcy law—“secur[ing] within a limited period the prompt and effectual administration and settlement of the debtor’s estate.” *See Chemetron Corp. v. Jones*, 72 F.3d 341, 346 (3d Cir. 1995).

32. The procedures described herein provide creditors with ample notice and opportunity, and a clear process, for filing Proofs of Claim and Administrative Claims, and the procedures help to achieve administrative and judicial efficiency. Indeed, the proposed procedures will provide comprehensive notice and clear instructions to creditors, on the one hand, and will allow these chapter 11 cases to move forward quickly with a minimum of administrative expense and delay, on the other hand.

33. The Debtors’ proposed procedures provide clear instructions that will help avoid confusion or uncertainty among creditors that might lead them to file unnecessary protective Proofs of Claim or multiple Proofs of Claim that would cause expense and delay in the claims process for all parties. Additionally, the proposed use of a personalized Proof of Claim Form for all known creditors is designed both to streamline the claims process and to provide useful information to creditors as to whether and how their claims are reflected in the Debtors’ Schedules. The proposed procedures are designed to comply with the Bankruptcy Code and provide the

Debtors with flexibility in case of the need for supplemental bar dates or situations in which a creditor's claim status may change during these chapter 11 cases (such as in the event of contract rejections). In addition, the procedures proposed for filing requests for payment of Administrative Claims set forth herein are fair and reasonable.

V. The Proposed Notice Procedures Are Reasonable and Appropriate.

34. Bankruptcy Rule 2002(a)(7) requires that the Debtors provide claimants at least twenty-one (21) days' notice by mail of the Bar Dates pursuant to Bankruptcy Rule 3003(c). Additionally, Bankruptcy Rule 2002(l) provides that the Court may order notice by publication if it finds that notice by mail is impractical or it is desirable to supplement other notice. Bankruptcy Rule 9008 also provides that the Court shall determine the form and manner of publication notice, the newspapers used, and the frequency of publication.

35. In conjunction with setting deadlines to file Proofs of Claim, the Debtors must give appropriate notice to interested parties. The Debtors propose to mail the Bar Date Notice to their known creditors and thus must rely on publication to give notice to their unknown creditors. This procedure is consistent with applicable case law and practice in this district. *See, e.g., Mullane v. Central Hanover Bank & Trust Co.*, 339 U.S. 306, 317 (1950); *Chemetron*, 72 F.3d at 346. To determine the adequacy of notice given to a creditor, bankruptcy law distinguishes between "known" and "unknown" creditors. *Chemetron*, 72 F.3d at 346. As the Third Circuit explained in *Chemetron*, "[k]nown creditors must be provided with actual written notice of a debtor's bankruptcy filing and bar claims date. For unknown creditors, notification by publication will generally suffice." *Id.* (citations omitted). A "known" creditor is one whose identity is either known or is "reasonably ascertainable by the debtor." *Id.* (citing *Tulsa Prof'l Collection Serv., Inc. v. Pope*, 485 U.S. 478, 490 (1988)). An "unknown" creditor is one whose "interests are either

conjectural or future or, although they could be discovered upon investigation, do not in due course of business come to knowledge [of the debtor].” *Id.* (citing *Mullane*, 339 U.S. at 317).

36. Where a creditor is known to the debtor, due process requires that the debtor must take reasonable steps, such as direct mailing, to provide actual notice of the deadline for filing proofs of claim. A creditor’s identity is “reasonably ascertainable” if that creditor can be identified through “reasonably diligent efforts.” *Mennonite Bd. of Missions v. Adams*, 462 U.S. 791, 798 n.4 (1983). But this does not require the debtor to engage in “impracticable and extended searches . . . in the name of due process.” *Mullane*, 339 U.S. at 317–18. Rather, the required search is limited to a debtor’s “books and records.” *Chemetron*, 72 F.3d at 347.

37. In addition, requiring entities asserting claims pursuant to section 503(b)(9) of the Bankruptcy Code to assert such claims by filing a Proof of Claim on or prior to the Claims Bar Date will ensure that the Debtors have complete information regarding the nature, validity, and amount of such section 503(b)(9) claims while affording parties asserting section 503(b)(9) claims appropriate and adequate notice. Moreover, this approach facilitates a more cost-effective and efficient claims process for such creditors and, by obviating the need for the Debtors to file a response to individual administrative expense requests, helps conserve estate resources to the benefit of the Debtors’ creditors.⁵

38. The Debtors submit that requiring parties to assert section 503(b)(9) claims by Proof of Claim on or before the Claims Bar Date is justified and warranted under the circumstances of these Chapter 11 Cases. Courts in this district routinely fix bar dates for filing

⁵ For the avoidance of doubt, parties asserting Administrative Claims under all other subparts of section 503(b) of the Bankruptcy Code must make separate requests for payment in accordance with section 503(a) of the Bankruptcy Code or as otherwise specified by the Bar Date Order, any other order of the Court, or any plan confirmed in these Chapter 11 Cases.

claims under section 503(b)(9) of the Bankruptcy Code. *See, e.g., In re First Guaranty Mortgage Corporation*, No. 22-10584 (CTG) (Bankr. D. Del. Aug. 31, 2022) (establishing a claims bar date for claims asserted pursuant to section 503(b)(9) of the Bankruptcy Code); *In re Sequential Brands Group, Inc., et al*, No. 21-11194 (JTD) (Bankr. D. Del. Oct. 4, 2021) (same); *In re Maines Paper & Food Service, Inc.*, No. 20-11502 (KBO) (Bankr. D. Del. July 9, 2020) (same); *In re True Religion Apparel, Inc.*, No. 17-11460 (CSS) (Bankr. D. Del. Aug. 2, 2017) (same); *In re Emerald Oil, Inc.*, No. 16-10704 (KG) (Bankr. D. Del. Mar. 22, 2016) (same).

39. The Debtors submit that the relief requested herein provides for clear notice of the Claims Bar Date (and other Bar Dates as set forth herein) in satisfaction of the requirements of the Bankruptcy Rules and consistent with the underlying policies of the Bankruptcy Code. Specifically, to the extent that the Claims Bar Date is established, as proposed, as April 30, 2026, the Debtors intend to: (a) cause the Bar Date Notice to be mailed no later than three days after the Schedules Filing Deadline; and (b) cause the Publication Notice to be published by a date that is at least thirty (30) days prior to the Claims Bar Date. Thus, by establishing the Claims Bar Date in accordance with the provisions hereof, all known claimants will have well more than twenty-one (21) days' notice, and unknown or unreachable claimants will have more than twenty-one (21) days of constructive notice of the Claims Bar Date for filing Proofs of Claim, thereby satisfying Bankruptcy Rule 2002(a)(7). Additionally, because the Debtors will incorporate information from their Schedules in the "personalized" Proof of Claim Form, known creditors will have ample time to review the Schedules, reconcile the information contained therein with their own books and records, and prepare and file Proofs of Claim if necessary.

40. In addition, in the event that the Debtors amend or supplement the Schedules subsequent to the date on which the Debtors serve the Bar Date Notice, the Debtors

shall give notice of any amendment or supplement to the holders of affected claims whereby such holders will have no less than thirty (30) days from the notice date to file Proofs of Claim with respect to their claims. Moreover, unless otherwise ordered by the Court, and in the event that the Debtors reject an executory contract or unexpired lease, holders of claims arising from such rejection, if any, shall file claims on account of such rejection by the later of: (a) the Claims Bar Date; (b) 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days following entry of an order approving the rejection of any executory contract or unexpired lease of the Debtors; and (c) any date that the Court may fix in the applicable order approving such rejection.

41. The procedures and notice periods described herein afford creditors ample opportunity to review the Schedules and file Proofs of Claim while at the same time ensuring that the Debtors can achieve certainty with respect to their liabilities in a timely manner. The entry of orders granting relief similar to that requested herein is routinely approved in large chapter 11 cases in this district. *See, e.g., In re First Guaranty Mortgage Corporation*, No. 22-10584 (CTG) (Bankr. D. Del. Aug. 31, 2022) (approving a general bar date that provided for approximately 40 days' notice to creditors); *In re Akorn, Inc., et al.*, Case No. 20-11177 (KBO) (Bankr. D. Del. June 23, 2020) (approving a general bar date that provided for approximately 40 days' notice to creditors); *In re Maines Paper & Food Service, Inc.*, No. 20-11502 (KBO) (Bankr. D. Del. July 9, 2020) (approving a general bar date that provided for approximately 38 days' notice to creditors); *In re True Religion Apparel, Inc.*, No. 17-11460 (CSS) (Bankr. D. Del. Aug. 2, 2017) (approving a general bar date that provided for approximately 40 days' notice to creditors); *In re Aquion Energy, Inc.*, No. 17-10500 (KJC) (Bankr. D. Del. Aug. 16, 2017) (approving a general bar date that provided for approximately 40 days' notice to creditors); *In re Horsehead Holding Corp.*, No. 16-10287 (CSS) (Bankr. D. Del. Mar. 22, 2016) (approving a general bar date that provided for

approximately 28 days' notice to creditors); *In re FAH Liquidating Corp. f/k/a Fisker Automotive Holdings, Inc.*, No. 13-13087 (KG) (Bankr. D. Del. Dec. 30, 2013) (approving a general bar date that provided for approximately 28 days' notice to creditors).

42. Accordingly, the Debtors respectfully submit that the Bar Dates and the form and manner of providing notice thereof are appropriate in light of the circumstances, inure to the benefit of all parties in interest, and should be approved.

Notice

43. The Debtors will provide notice of this Motion to the following parties, or their counsel if known: (a) the U.S. Trustee; (b) the Committee; (c) counsel to the DIP Lenders; (d) counsel to the DIP Agent; and (e) all parties requesting notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

No Prior Request

44. No prior request for the relief sought in this Motion has been made to this Court or any other court.

WHEREFORE, the Debtors respectfully request that the Court enter the Bar Date Order granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

Dated: March 10, 2026

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Mary F. Caloway

Richard M. Pachulski, Esq. (admitted *pro hac vice*)
Mary F. Caloway, Esq. (DE Bar No. 3059)
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Proposed Counsel to the Debtors and Debtors in Possession

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AVENGER FLIGHT GROUP, LLC, *et al.*,

Debtors.¹

Chapter 11

Case No. 26-10183 (MFW)

(Jointly Administered)

Objection Deadline: March 17, 2026 at 4:00 p.m. (ET)

Hearing Date: March 24, 2026 at 3:00 p.m. (ET)

NOTICE OF DEBTORS' MOTION FOR ENTRY OF AN ORDER: (I) SETTING BAR DATES FOR FILING PROOFS OF CLAIM, INCLUDING REQUESTS FOR PAYMENT UNDER SECTION 503(b)(9) OF THE BANKRUPTCY CODE; (II) SETTING A BAR DATE FOR THE FILING OF PROOFS OF CLAIM BY GOVERNMENTAL UNITS; (III) SETTING A BAR DATE FOR THE FILING OF REQUESTS FOR ALLOWANCE OF ADMINISTRATIVE EXPENSE CLAIMS; (IV) ESTABLISHING AN AMENDED SCHEDULES BAR DATE AND A REJECTION DAMAGES BAR DATE; (V) APPROVING THE FORM OF AND MANNER FOR FILING PROOFS OF CLAIM; (VI) APPROVING A NOTICE OF BAR DATES; AND (VII) GRANTING RELATED RELIEF

PLEASE TAKE NOTICE that on March 10, 2026, the above-captioned debtors and debtors in possession (the "Debtors") filed the attached *Debtors' Motion for Entry of an Order: (I) Setting Bar Dates for Filing Proofs of Claim, Including Requests for Payment under Section 503(b)(9) of the Bankruptcy Code; (II) Setting a Bar Date for the Filing of Proofs of Claim by Governmental Units; (III) Setting a Bar Date for the Filing of Requests for Allowance of Administrative Expense Claims; (IV) Establishing an Amended Schedules Bar Date and a*

¹ The Debtors in these chapter 11 cases and the last four digits of their respective federal tax identification numbers are: Avenger Flight Group, LLC (1216); AFG Dallas III, LLC (5615); AFG Dallas IV, LLC (5558); AFG Dallas, LLC (3418); AFG EU Operations Corp. (9406); AFG FLL, LLC (6470); AFG Latam Holding Corp. (6475); AFG Latam Sim Holdings II, LLC (0473); AFG Latam Sim Holdings III, LLC (2592); AFG Latam Sim Holdings IV, LLC (0093); AFG Latam Sim Holdings, LLC (6475); AFG Latam, LLC (9545); AFG Mexico Corp. (1402); AFG Orlando, LLC (8409); AFG Sanford, LLC (6661); AFG Sim Holding Corp. (3325); Avenger Flight Group Europe, Corp. (5908); Avenger Flight Group Topco, LLC (5643); Avenger Flight Training, LLC (5640); Avenger Flight Group Mexico II, S. de R.L. de C.V, (N/A); and Papi Flight Training, LLC (6206). The location of the Debtors' corporate headquarters and the Debtors' service address is Avenger Flight Group LLC, 1450 Lee Wagener Blvd., Fort Lauderdale, FL 33315.

Rejection Damages Bar Date; (V) Approving the Form of and Manner for Filing Proofs of Claim; (VI) Approving a Notice of Bar Dates; and (VII) Granting Related Relief (the “Motion”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801 (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that any responses to the Motion must be in writing and filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Third Floor, Wilmington, Delaware 19801, and served upon the undersigned, so as to be received **on or before 4:00 p.m. (prevailing Eastern Time) on March 17, 2026.**

PLEASE TAKE FURTHER NOTICE that at the same time, you must also serve a copy of the response or objection upon: (i) proposed counsel to the Debtors, Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, P.O. Box 8705, Wilmington, DE 19899-8705 (Courier 19801), Attn: Richard M. Pachulski (rpachulski@pszjlaw.com) and Mary F. Caloway (mcaloway@pszjlaw.com); (ii) the Office of the United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801, Attn: Attn: Jon Lipshie, Esq. (jon.lipshie@usdoj.gov); (iii) counsel to the DIP Lenders, (a) Proskauer Rose LLP, Eleven Times Square, New York, New York 10036 (Attn: David M. Hillman (dhillman@proskauer.com) and Matthew R. Koch (mkoch@proskauer.com)), and (b) Landis Rath & Cobb LLP, 919 Market Street, Suite 1800, Wilmington, Delaware 19801 (Attn: Matthew B. McGuire (mcguire@lrclaw.com)); (iv) counsel to the DIP Agent, Alston & Bird LLP, 90 Park Avenue, New York, New York 10016 (Attn: William Hao (william.hao@alston.com) and Dylan S. Cassidy (dylan.cassidy@alston.com)); and (v) proposed counsel for the official committee of unsecured creditors: (a) Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, NY 10019-6099,

Attn: Brett H. Miller (bmiller@willkie.com), Todd M. Goren (tgoren@willkie.com), James H. Burbage (jburbage@willkie.com) and Joseph R. Brandt (jbrandt@willkie.com), and (b) Womble Bond Dickinson, 1313 N. Market Street, Suite 1200, Wilmington, DE 19801, Attn: Matthew P. Ward (matthew.ward@wbd-us.com) and Todd A. Atkinson (todd.atkinson@wbd-us.com).

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE RELIEF SOUGHT IN THE APPLICATION WILL BE HELD ON MARCH 24, 2026 AT 3:00 P.M. PREVAILING EASTERN TIME BEFORE THE HONORABLE MARY F. WALRATH, UNITED STATES BANKRUPTCY COURT JUDGE, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 5TH FLOOR, COURTROOM NO. 4, WILMINGTON, DELAWARE 19801.

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Dated: March 10, 2026

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Mary F. Caloway

Richard M. Pachulski, Esq. (admitted *pro hac vice*)

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Proposed Counsel to the Debtors and Debtors in Possession

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AVENGER FLIGHT GROUP, LLC, *et al.*,

Debtors.¹

Chapter 11

Case No. 26-10183 (MFW)

(Jointly Administered)

ORDER: (I) SETTING BAR DATES FOR FILING PROOFS OF CLAIM, INCLUDING REQUESTS FOR PAYMENT UNDER SECTION 503(b)(9) OF THE BANKRUPTCY CODE; (II) SETTING A BAR DATE FOR THE FILING OF PROOFS OF CLAIM BY GOVERNMENTAL UNITS; (III) SETTING A BAR DATE FOR THE FILING OF REQUESTS FOR ALLOWANCE OF ADMINISTRATIVE EXPENSE CLAIMS; (IV) ESTABLISHING AN AMENDED SCHEDULES BAR DATE AND A REJECTION DAMAGES BAR DATE; (V) APPROVING THE FORM OF AND MANNER FOR FILING PROOFS OF CLAIM; (VI) APPROVING A NOTICE OF BAR DATES; AND (VII) GRANTING RELATED RELIEF

Upon the motion (the “Motion”)² of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for entry of an order (this “Order”): (a) establishing deadlines for filing proofs of claim, including requests for payment under section 503(b)(9) of the Bankruptcy Code, in these Chapter 11 Cases; (b) establishing the Governmental Bar Date; (c) establishing the Administrative Claims Bar Date; (d) establishing the Amended Schedules Bar Date and the Rejection Damages Bar Date; (e) approving the form and manner for filing such claims, including any section 503(b)(9) requests for payment; (f) approving notice of the Bar

¹ The Debtors in these chapter 11 cases and the last four digits of their respective federal tax identification numbers are: Avenger Flight Group, LLC (1216); AFG Dallas III, LLC (5615); AFG Dallas IV, LLC (5558); AFG Dallas, LLC (3418); AFG EU Operations Corp. (9406); AFG FLL, LLC (6470); AFG Latam Holding Corp. (6475); AFG Latam Sim Holdings II, LLC (0473); AFG Latam Sim Holdings III, LLC (2592); AFG Latam Sim Holdings IV, LLC (0093); AFG Latam Sim Holdings, LLC (6475); AFG Latam, LLC (9545); AFG Mexico Corp. (1402); AFG Orlando, LLC (8409); AFG Sanford, LLC (6661); AFG Sim Holding Corp. (3325); Avenger Flight Group Europe, Corp. (5908); Avenger Flight Group Topco, LLC (5643); Avenger Flight Training, LLC (5640); Avenger Flight Group Mexico II, S. de R.L. de C.V, (N/A); and Papi Flight Training, LLC (6206). The location of the Debtors’ corporate headquarters and the Debtors’ service address is Avenger Flight Group LLC, 1450 Lee Wagener Blvd., Fort Lauderdale, FL 33315.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

Dates; (g) approving the proposed form of publication notice; and (h) granting related relief, all as more fully set forth in the Motion; and the United States District Court for the District of Delaware having jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to this Court under 28 U.S.C. § 157 pursuant to the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor, IT IS HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.

I. The Bar Dates and Procedures for Filing Proofs of Claim and Administrative Claims

2. Each person or entity³ that asserts a claim against the Debtors that arose or is deemed to have arisen before the Petition Date, including requests for payment under section 503(b)(9) of the Bankruptcy Code, shall be required to file an original, written proof of claim (a "Proof of Claim"), substantially in the form attached to the Motion as **Exhibit B** (the "Proof of

³ Except as otherwise defined herein and in the Motion, all terms specifically defined in the Bankruptcy Code have those meanings ascribed to them by the Bankruptcy Code. In particular, as used herein: (a) the term "claim" has the meaning given to it in section 101(5) of the Bankruptcy Code; (b) the term "entity" has the meaning given to it in section 101(15) of the Bankruptcy Code; (c) the term "governmental unit" has the meaning given to it in section 101(27) of the Bankruptcy Code; and (d) the term "person" has the meaning given to it in section 101(41) of the Bankruptcy Code.

Claim Form”) or Official Form 410.⁴ Except in the cases of governmental units and certain other exceptions explicitly set forth herein, **all Proofs of Claim must be filed so that they are actually received on or before April 30, 2026 at 5:00 p.m. prevailing Eastern Time (the “Claims Bar Date”) at the addresses and in the form set forth herein.** The Claims Bar Date applies to all types of claims against the Debtors that arose or are deemed to have arisen before the Petition Date, except for claims specifically exempt from complying with the applicable Bar Dates (as defined herein) as set forth in this Order.

3. All governmental units holding claims (whether secured, unsecured priority, or unsecured non-priority) that arose or are deemed to have arisen prior to the Petition Date must file Proofs of Claim, including claims for unpaid taxes, whether such claims arise from prepetition tax years or periods or prepetition transactions to which the Debtors were a party, **so they are actually received on or before August 11, 2026 at 5:00 p.m. prevailing Eastern Time (the “Governmental Bar Date,” and together with the Claims Bar Date, the “Bar Date” or “Bar Dates,” as may be applicable) at the addresses and in the form set forth herein.**

4. All parties asserting a request for payment of Administrative Claims arising or deemed to be arisen on or prior to **April 14, 2026**, but excluding claims for fees and expenses of professionals retained in these proceedings and claims asserting priority pursuant to section 503(b)(9) of the Bankruptcy Code, are required to file a request for payment of such Administrative Claim with the Court and, if desired, a notice of hearing on such Administrative Claim⁵ **so that**

⁴ Copies of Official Form 410 may be obtained by: (a) contacting the Debtors’ notice and claims agent, Verita, directly by writing to: 222 N. Pacific Coast Highway, Suite 300, El Segundo, CA 90245, by contacting the Debtors’ information line at (877) 725-7534 (U.S./Canada) or +1 (424) 236-7234 (International), or submitting an inquiry at <https://www.veritaglobal.net/avengerfg/inquiry>, (b) visiting the Debtors’ website at <https://www.veritaglobal.net/AvengerFG>; or (c) visiting the website maintained by the Court at <https://www.deb.uscourts.gov>.

⁵ Administrative Claims filed without a notice of hearing shall not be scheduled for hearing.

the Administrative Claim is actually filed with the Court on or before April 30, 2026 at 5:00 p.m. prevailing Eastern Time (the “Administrative Claims Bar Date”).

5. If the Debtors file a previously unfiled Schedule or amend or supplement the Schedules after having given notice of the Bar Dates, the Debtors shall give notice by first-class mail of any filing, amendment, or supplement to holders of claims directly affected thereby, and the deadline for those holders to file Proofs of Claim, if necessary, shall be the later of: (a) the Claims Bar Date or the Governmental Bar Date, as applicable; or (b) 5:00 p.m. prevailing Eastern Time on the date that is **thirty (30) days** from the date the notice of the filing, amendment, or supplement is given (or another time period as may be fixed by the Court) (the “Amended Schedules Bar Date”).

6. Unless otherwise ordered, all persons or entities asserting claims arising from the rejection of executory contracts or unexpired leases of the Debtors shall file a Proof of Claim on account of such rejection by the later of: (a) the Claims Bar Date; (b) 5:00 p.m. prevailing Eastern Time on the date that is 30 days after the later of (i) the effective date of the rejection of such executory contract or unexpired lease, or (ii) entry of any order authorizing the rejection of such executory contract or unexpired lease; and (c) any date that the Court may fix in the applicable order approving such rejection (the “Rejection Damages Bar Date”). For the avoidance of doubt, a counterparty to an executory contract or unexpired lease of the Debtors shall not be required to file proofs of claim with respect to any claims relating to such executory contract or unexpired lease unless and until such executory contract or unexpired lease has been rejected.

7. All Proofs of Claim must be filed so as to be actually received by Verita, the notice and claims agent retained in these Chapter 11 Cases on or before the Claims Bar Date or the Governmental Bar Date (or, where applicable, on or before any other bar date as set forth

herein). In addition, all Administrative Claims requests arising on or prior to the Administrative Claims Deadline must be filed with the Court so as to be actually received by the Court by the Administrative Claims Bar Date. If Proofs of Claim and such Administrative Claims requests are not received by Verita or the Court, as applicable, on or before the Claims Bar Date, the Governmental Bar Date, or the Administrative Claims Bar Date, as applicable, except in the case of certain exceptions explicitly set forth herein, the holders of the underlying claims shall be barred from asserting such claims against the Debtors and precluded from voting on any plans filed in these Chapter 11 Cases or receiving distributions from the Debtors on account of such claims in these Chapter 11 Cases.

II. Parties Exempted from the Bar Date

8. The following categories of claimants shall not be required to file a Proof of Claim or Administrative Claim arising or deemed to have arisen on or prior to the Administrative Claims Deadline by the applicable Bar Date:

- a. any person or entity who has already filed a signed Proof of Claim against the respective Debtor(s) with the Clerk of the Court or with Verita in a form substantially similar to Official Form 410;
- b. any person or entity whose claim is listed on the Schedules if: (i) the claim is *not* scheduled as any of “disputed,” “contingent,” or “unliquidated”; (ii) such person or entity agrees with the amount, nature, and priority of the claim as set forth in the Schedules; and (iii) such person or entity does not dispute that its claim is an obligation only of the specific Debtor against which the claim is listed in the Schedules;
- c. any person or entity whose claim has previously been allowed by order of the Court;
- d. any person or entity whose claim has been paid in full by the Debtors pursuant to the Bankruptcy Code or in accordance with an order of the Court;
- e. any Debtor having a claim against another Debtor;

- f. any Debtor having a claim against a Debtor affiliate;
- g. any counterparty to a non-residential real property lease that is assumed or assumed and assigned pursuant to section 365 of the Bankruptcy Code;
- h. any landlord counterparty of an executory contract of an unexpired non-real property lease where the lease has not yet been rejected as of the Claims Bar Date or Administrative Bar Date; provided that, for the avoidance of doubt, if a landlord counterparty's lease is rejected, the deadline for filing claims established under the applicable rejection order shall apply to all claims arising under the lease in question, including Administrative Claims, and entities holding such claims shall not be required to file a Proof of Claim with respect to prepetition amounts or an Administrative Claim with respect to postpetition amounts unless and until such unexpired lease has been rejected;
- i. any person or entity holding a claim for which a separate deadline is fixed by this Court;
- j. any person or entity holding a claim for fees and expenses of professionals retained in these Chapter 11 Cases;
- k. claims of the U.S. Trustee for quarterly fees; and
- l. pursuant to paragraph 41 of the *Interim Order (I) Authorizing the Debtors to Obtain Senior Secured Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief* [Docket No. 59] or any corresponding paragraph contained in the Final Order (as defined in the Interim DIP Order), any of the DIP Secured Parties or any of the Prepetition Term Loan Secured Parties (each as defined in the Interim DIP Order).⁶

⁶ The relevant administrative agent, registrar, paying agent, loan or collateral agent, or any other entity serving in a similar capacity however designated (each, a "Debt Agent") under the Prepetition Term Loan Documents or the DIP Documents is authorized (but is not directed or required) to file a single master Proof of Claim (a "Master Proof of Claim"), on or before the applicable Bar Date, in the Debtors' lead case, *In re Avenger Flight Group, LLC, et al.*, jointly administered under Case No. 26-10183 (MFW), against the Debtors on account of any and all obligations and claims arising thereunder (each, a "Debt Claim" and collectively the "Debt Claims"), without the need for further designation by such party, and shall be deemed filed against each Debtor identified therein, on its own behalf and on behalf of any other holder of a Debt Claim; *provided that* the Master Proof of Claim shall not be required to attach any instruments, agreements, or other documents evidencing the Debt Claims.

III. Substantive Requirements of Proofs of Claim

9. The following requirements shall apply with respect to filing and preparing each Proof of Claim:

- a. **Contents.** Each Proof of Claim must: (i) be written in English; (ii) include a claim amount denominated in United States dollars; (iii) conform substantially with the Proof of Claim Form provided by the Debtors or Official Form 410; and (iv) be signed by the claimant or by an authorized agent or legal representative of the claimant.
- b. **Section 503(b)(9).** Any Proof of Claim asserting a claim entitled to priority under section 503(b)(9) must also: (i) include the value of the goods delivered to and received by the Debtors in the twenty (20) days prior to the Petition Date; (ii) attach any documentation identifying the particular invoices for which the section 503(b)(9) claim is being asserted; and (iii) attach documentation of any reclamation demand made to the Debtors under section 546(c) of the Bankruptcy Code (if applicable).
- c. **Section 507(a)(7) Claim.** Any Proof of Claim asserting a customer deposit claim entitled to priority under section 507(a)(7) must also include the total value of the deposit paid prior to the Petition Date and attach documentation supporting proof of the purchase.
- d. **Original Signatures Required.** Only *original* Proofs of Claim may be deemed acceptable for purposes of claims administration. Copies of Proofs of Claim or Proofs of Claim sent by facsimile or electronic mail will not be accepted, provided, however, that Proofs of Claim filed through the electronic interface provided by the Debtors' claims agent are deemed to be filed with original signatures.
- e. **Identification of the Debtor Entity.** Each Proof of Claim must clearly identify the Debtor against which a claim is asserted, including the individual Debtor's case number. Except as provided in paragraph 8(l) herein, a Proof of Claim filed under the joint administration case number or otherwise without identifying a specific Debtor will be deemed as filed only against Avenger Flight Group, LLC.
- f. **Claim Against Multiple Debtor Entities.** Unless otherwise ordered by the Court, each Proof of Claim must state a claim against *only*

Capitalized terms used but not defined in this footnote shall have the meanings ascribed to such terms in the Interim DIP Order.

one Debtor and clearly indicate the Debtor against which the claim is asserted. To the extent that more than one Debtor is listed on the Proof of Claim, such claim may be treated as if filed only against the first-listed Debtor.

- g. ***Supporting Documentation.*** Each Proof of Claim must include supporting documentation in accordance with Bankruptcy Rules 3001(c) and (d). However, if such documentation is voluminous, such Proof of Claim may include a summary of such documentation or an explanation as to why such documentation is not available; *provided* that any creditor that includes a summary shall be required to transmit such documentation to the Debtors' counsel upon request no later than ten days from the date of such request.
- h. ***Timely Service.*** Each Proof of Claim must be filed, including supporting documentation, so as to be ***actually received*** by Verita on or before the applicable Bar Date (or, where applicable, on or before any other bar date established by order of the Court), either: (1) electronically through the interface at <https://www.veritaglobal.net/avengerfg>; or (2) by first-class or overnight U.S. mail, or by other hand delivery system, at the following address:

**Avenger Claims Processing Center
c/o KCC dba Verita
222 N. Pacific Coast Highway, Suite 300
El Segundo, CA 90245**

PROOFS OF CLAIM SUBMITTED BY FACSIMILE OR ELECTRONIC MAIL WILL NOT BE ACCEPTED.

- i. ***Receipt of Service.*** Claimants wishing to receive acknowledgment that their Proofs of Claim were received by Verita must submit: (i) a copy of the Proof of Claim Form (in addition to the original Proof of Claim Form sent to Verita); and (ii) a self-addressed, stamped envelope.

IV. Identification of Known Creditors

10. The Debtors shall mail notice of the Claims Bar Date (or the Governmental Bar Date, as applicable) to their known creditors and such mailing shall be made to the last known mailing address for each such creditor.

V. Procedures for Providing Notice of the Bar Date

A. Mailing of Bar Date Notices

11. Pursuant to Bankruptcy Rule 2002(a)(7), the Debtors propose to cause written notice of the Bar Dates, substantially in the form attached to the Motion as **Exhibit C** (the “Bar Date Notice”) and a Proof of Claim Form (collectively, the “Bar Date Package”) to be mailed via first-class mail, no later than three business days after the Schedules Filing Deadline, to the following entities:

- a. the U.S. Trustee;
- b. Wilkie Farr & Gallagher LLP as counsel to the Committee;
- c. Womble Bond Dickinson as co-counsel to the Committee;
- d. all known creditors and other known holders of claims against the Debtors, including all entities listed in the Schedules as holding claims against the Debtors;
- e. all entities that have requested notice of the proceedings in these Chapter 11 Cases pursuant to Bankruptcy Rule 2002 as of the date of the Bar Date Order;
- f. all entities that have filed proofs of claim in these Chapter 11 Cases as of the date of the Bar Date Order;
- g. all known non-Debtor equity and interest holders of the Debtors as of the date the Bar Date Order is entered (whose Bar Date Package shall not contain a Proof of Claim Form);
- h. all known entities who are parties to executory contracts and unexpired leases with the Debtors;
- i. all known persons or entities who are parties to litigation with the Debtors and their counsel of record (if known);
- j. all persons and entities known by the Debtors to have asserted any lien, claim, interest or encumbrance against the Debtors’ assets;
- k. all current and former employees of the Debtors from the past two years (to the extent that contact information for former employees is available in the Debtors’ records);

- l. all regulatory authorities that regulate the Debtors' businesses, including environmental and permitting authorities;
- m. all applicable federal, state, and local taxing authorities;
- n. the Office of the Attorney General for the State of Delaware;
- o. the office of the attorney general for each state in which the Debtors maintain or conduct business;
- p. the District Director of the Internal Revenue Service for the District of Delaware; and
- q. the United States Attorney's Office for the District of Delaware.

12. The Debtors shall provide all known creditors listed in the Debtors' Schedules and, upon any amendment to the Debtors' Schedules, each of the creditors affected by such amendment, with a "personalized" Proof of Claim Form, which will identify how the Debtors have scheduled the creditors' claims in the Schedules, including, without limitation: (a) the identity of the Debtor against which the creditor's claim is scheduled; (b) the amount of the scheduled claim, if any; (c) whether the claim is listed as contingent, unliquidated, or disputed; and (d) whether the claim is listed as secured, unsecured priority, or unsecured non-priority. Each creditor shall have an opportunity to inspect the Proof of Claim Form provided by the Debtors and to correct any information that is missing, incorrect, or incomplete. Additionally, any creditor may choose to submit a Proof of Claim on a different form as long as it is substantially similar to Official Form 410.

13. After the initial mailing of the Bar Date Packages, the Debtors may, in their discretion, make supplemental mailings of notices or packages, including in the event that: (a) notices are returned by the post office with forwarding addresses; (b) certain parties acting on behalf of parties in interest decline to pass along notices to these parties and instead return their names and addresses to the Debtors for direct mailing; and (c) additional potential claimants

become known as the result of the Bar Date mailing process. In this regard, the Debtors may make supplemental mailings of the Bar Date Package in these and similar circumstances at any time up to thirty (21) days in advance of the Bar Date, with any such mailings being deemed timely and the Bar Date being applicable to the recipient creditors.

B. Publication of Bar Date Notice

14. The Debtors shall cause notice of the Claims Bar Date and the Governmental Bar Date to be given by publication to creditors to whom notice by mail is impracticable, including creditors who are unknown or not reasonably ascertainable by the Debtors and creditors whose identities are known but whose addresses are unknown by the Debtors. Specifically, the Debtors shall cause the Bar Date Notice to be published, modified for publication in substantially the form attached to the Motion as **Exhibit D** (the “Publication Notice”), on one occasion in the national edition of *The New York Times* or other paper of similar national circulation on or before a date at least thirty (30) days before the Claims Bar Date.

15. Notice of the Bar Dates as set forth in this Order and in the manner set forth herein (including, but not limited to, the Bar Date Notice, the Publication Notice, and any supplemental notices that the Debtors may send from time to time) constitutes adequate and sufficient notice of each of the Bar Dates and satisfies the requirements of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules.

16. The Debtors may make corrections, additions, or deletions to the Bar Date Package and the publication notice as appropriate, including to remove stale or non-pertinent information upon providing prior written notice (with email being sufficient) to the Committee and DIP Lenders.

VI. Consequences of Failure to File a Proof of Claim or Administrative Claim

17. Any person or entity who is required, but fails, to file a Proof of Claim or an Administrative Claim request with the Court for an Administrative Claim arising or deemed to have arisen on or prior to the Administrative Claims Deadline in accordance with the Bar Date Order on or before the applicable Bar Date shall be forever barred, estopped, and enjoined from asserting such claim against the Debtors (or filing a Proof of Claim or Administrative Claim request with respect thereto), and the Debtors and their property shall be forever discharged from any and all indebtedness or liability with respect to or arising from such claim, *provided* that late-filed proofs of claim shall be treated in accordance with section 726(a)(3) of the Bankruptcy Code. Without limiting the foregoing sentence, any creditor asserting a claim entitled to priority pursuant to section 503(b)(9) of the Bankruptcy Code that fails to file a Proof of Claim in accordance with this Bar Date Order shall not be entitled to any priority treatment on account of such claim pursuant to section 503(b)(9) of the Bankruptcy Code, regardless of whether such claim is identified on Schedule E/F of the Schedules as not contingent, not disputed, or not liquidated.

18. Any person or entity who is required to file a Proof of Claim but fails to do so in accordance with the Bar Date Order shall be prohibited from voting to accept or reject any plan filed in these Chapter 11 Cases, participating in any distribution in these Chapter 11 Cases on account of such claim, or receiving further notices regarding such claim.

19. Notice of the Bar Dates as set forth in this Order and in the manner set forth herein (including, but not limited to, the Bar Date Notice, the Publication Notice, and any supplemental notices that the Debtors may send from time to time) constitutes adequate and sufficient notice of each of the Bar Dates and satisfies the requirements of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules.

VII. Miscellaneous

20. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion, and the requirements of Bankruptcy Rule 6004(a) and the Local Rules are satisfied by such notice.

21. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon its entry.

22. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

23. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

EXHIBIT B

Proof of Claim Form

Your claim can be filed electronically on Verita's website at <https://www.veritaglobal.net/AvengerFG>

United States Bankruptcy Court for the District of Delaware

Indicate Debtor against which you assert a claim by checking the appropriate box below. **(Check only one Debtor per claim form.)**

- | | | |
|------------------------------------------------------------------------------|------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> Avenger Flight Group Topco, LLC (Case No. 26-10182) | <input type="checkbox"/> AFG Latam Holding Corp. (Case No. 26-10189) | <input type="checkbox"/> AFG Orlando, LLC (Case No. 26-10196) |
| <input type="checkbox"/> Avenger Flight Group, LLC (Case No. 26-10183) | <input type="checkbox"/> AFG Latam Sim Holdings II, LLC (Case No. 26-10190) | <input type="checkbox"/> AFG Sanford, LLC (Case No. 26-10197) |
| <input type="checkbox"/> AFG Dallas III, LLC (Case No. 26-10184) | <input type="checkbox"/> AFG Latam Sim Holdings III, LLC (Case No. 26-10191) | <input type="checkbox"/> AFG Sim Holding Corp. (Case No. 26-10198) |
| <input type="checkbox"/> AFG Dallas IV, LLC (Case No. 26-10185) | <input type="checkbox"/> AFG Latam Sim Holdings IV, LLC (Case No. 26-10192) | <input type="checkbox"/> Avenger Flight Group Europe, Corp. (Case No. 26-10199) |
| <input type="checkbox"/> AFG Dallas, LLC (Case No. 26-10186) | <input type="checkbox"/> AFG Latam Sim Holdings, LLC (Case No. 26-10193) | <input type="checkbox"/> Avenger Flight Training, LLC (Case No. 26-10200) |
| <input type="checkbox"/> AFG EU Operations Corp. (Case No. 26-10187) | <input type="checkbox"/> AFG Latam, LLC (Case No. 26-10194) | <input type="checkbox"/> Avenger Flight Group Mexico II, S. DE R.L. DE C.V. (Case No. 26-10201) |
| <input type="checkbox"/> AFG FLL, LLC (Case No. 26-10188) | <input type="checkbox"/> AFG Mexico Corp. (Case No. 26-10195) | <input type="checkbox"/> Papi Flight Training, LLC (Case No. 26-10202) |

Modified Official Form 410 Proof of Claim

04/25

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Other than a claim under 11 U.S.C. § 503(b)(9), this form should not be used to make a claim for an administrative expense arising after the commencement of the case.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed.

Part 1: Identify the Claim

1. Who is the current creditor?	_____ Name of the current creditor (the person or entity to be paid for this claim)	
	Other names the creditor used with the debtor _____	
2. Has this claim been acquired from someone else?	<input type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent?	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)
	Name _____ Number _____ Street _____ City _____ State _____ ZIP Code _____ Country _____ Contact phone _____ Contact email _____	Name _____ Number _____ Street _____ City _____ State _____ ZIP Code _____ Country _____ Contact phone _____ Contact email _____
	Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	
	Uniform claim identifier (if you use one): _____	
4. Does this claim amend one already filed?	<input type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor? No
 Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____

7. How much is the claim? \$ _____ Does this amount include interest or other charges?
 No
 Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.
 Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
 Limit disclosing information that is entitled to privacy, such as health care information.

9. Is all or part of the claim secured? No
 Yes. The claim is secured by a lien on property.
Nature of property:
 Real estate: If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
 Motor vehicle
 Other. Describe: _____
Basis for perfection: _____
 Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)
Value of property: \$ _____
Amount of the claim that is secured: \$ _____
Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amount should match the amount in line 7.)
Amount necessary to cure any default as of the date of the petition: \$ _____
Annual Interest Rate (when case was filed) _____%
 Fixed
 Variable

10. Is this claim based on a lease? No
 Yes. Amount necessary to cure any default as of the date of the petition. \$ _____

11. Is this claim subject to a right of setoff? No
 Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

No

Yes. Check all that apply:

Amount entitled to priority

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

\$ _____

Up to \$3,800* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

\$ _____

Wages, salaries, or commissions (up to \$17,150* earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

\$ _____

Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

\$ _____

Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

\$ _____

Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

\$ _____

* Amounts are subject to adjustment on 4/01/28 and every 3 years after that for cases begun on or after the date of adjustment.

13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?

No

Yes. Indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim.

\$ _____

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(3) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

I am the creditor.

I am the creditor's attorney or authorized agent.

I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date _____
MM / DD / YYYY

Signature _____

Print the name of the person who is completing and signing this claim:

Name _____
First name Middle name Last name

Title _____

Company _____
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address _____
Number Street

City State ZIP Code Country

Contact phone _____ Email _____

Modified Official Form 410

Instructions for Proof of Claim

United States Bankruptcy Court

12/24

These instructions and definitions generally explain the law. In certain circumstances, such as bankruptcy cases that debtors do not file voluntarily, exceptions to these general rules may apply. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the bankruptcy process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.
18 U.S.C. §§ 152, 157 and 3571

How to fill out this form

- **Fill in all of the information about the claim as of the date the case was filed.**

- **Fill in the caption at the top of the form**

- **If the claim has been acquired from someone else, then state the identity of the last party who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.**

- **Attach any supporting documents to this form.**
Attach redacted copies of any documents that show that the debt exists, a lien secures the debt, or both. (See the definition of *redaction* on the next page.)

Also attach redacted copies of any documents that show perfection of any security interest or any assignments or transfers of the debt. In addition to the documents, a summary may be added. Federal Rule of Bankruptcy Procedure (called “Bankruptcy Rule”) 3001(c) and (d).

- **Do not attach original documents because attachments may be destroyed after scanning.**

- **If the claim is based on delivering health care goods or services, do not disclose confidential health care information. Leave out or redact confidential information both in the claim and in the attached documents.**

PLEASE SEND COMPLETED PROOF(S) OF CLAIM TO:

Avenger Claims Processing Center
c/o KCC dba Verita Global
222 N. Pacific Coast Hwy., Ste. 300
El Segundo, CA 90245

Alternatively, your claim can be filed electronically on Verita's website at <https://www.veritaglobal.net/AvengerFG>

- **A Proof of Claim form and any attached documents must show only the last 4 digits of any social security number, individual's tax identification number, or financial account number, and only the year of any person's date of birth.** See Bankruptcy Rule 9037.

- **For a minor child, fill in only the child's initials and the full name and address of the child's parent or guardian.**
For example, write *A.B., a minor child (John Doe, parent, 123 Main St., City, State)*. See Bankruptcy Rule 9037.

Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, either enclose a stamped self-addressed envelope and a copy of this form or you may view a list of filed claims in this case by visiting the Claims and Noticing and Agent's website at <https://www.veritaglobal.net/AvengerFG>

Understand the terms used in this form

Administrative expense: Generally, an expense that arises after a bankruptcy case is filed in connection with operating, liquidating, or distributing the bankruptcy estate.
11 U.S.C. § 503.

Claim: A creditor's right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Claim Pursuant to 11 U.S.C. §503(b)(9): A claim arising from the value of any goods received by the Debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of the Debtor's business. Attach documentation supporting such claim.

Creditor: A person, corporation, or other entity whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. §101 (10).

Debtor: A person, corporation, or other entity who is in bankruptcy. Use the debtor's name and case number as shown in the bankruptcy notice you received. 11 U.S.C. §101 (13).

Evidence of perfection: Evidence of perfection of a security interest may include documents showing that a security interest has been filed or recorded, such as a mortgage, lien, certificate of title, or financing statement.

Information that is entitled to privacy: A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

Priority claim: A claim within a category of unsecured claims that is entitled to priority under 11 U.S.C. §507(a). These claims are paid from the available money or property in a bankruptcy case before other unsecured claims are paid. Common priority unsecured claims include alimony, child support, taxes, and certain unpaid wages.

Proof of claim: A form that shows the amount of debt the debtor owed to a creditor on the date of the bankruptcy filing. The form must be filed in the district where the case is pending.

Redaction of information: Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

Do not file these instructions with your form.

Secured claim under 11 U.S.C. §506(a): A claim backed by a lien on particular property of the debtor. A claim is secured to the extent that a creditor has the right to be paid from the property before other creditors are paid. The amount of a secured claim usually cannot be more than the value of the particular property on which the creditor has a lien. Any amount owed to a creditor that is more than the value of the property normally may be an unsecured claim. But exceptions exist; for example, see 11 U.S.C. § 1322(b) and the final sentence of 1325(a).

Examples of liens on property include a mortgage on real estate a security interest in a car. A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In states, a court judgment may be a lien.

Setoff: Occurs when a creditor pays itself with money belonging to the debtor that it is holding, or by canceling a debt it owes to the debtor.

Uniform claim identifier: An optional 24-character identifier that some creditors use to facilitate payment.

Unsecured claim: A claim that does not meet the requirements of a secured claim. A claim may be unsecured in part to the extent that the amount of the claim is more than the value of the property on which a creditor has a lien.

Offers to purchase a claim

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.

EXHIBIT C

Form of Bar Date Notice

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AVENGER FLIGHT GROUP, LLC, *et al.*,Debtors.¹

Chapter 11

Case No. 26-10183 (MFW)

(Jointly Administered)

**NOTICE OF DEADLINES FOR THE FILING OF:
(I) PROOFS OF CLAIM, INCLUDING REQUESTS FOR PAYMENT
PURSUANT TO SECTION 503(b)(9) OF THE BANKRUPTCY CODE;
(II) ADMINISTRATIVE CLAIMS; AND (III) REJECTION DAMAGES CLAIMS**

**TO: ALL PERSONS AND ENTITIES WHO MAY HAVE CLAIMS AGAINST ANY OF THE
FOLLOWING DEBTOR ENTITIES:**

DEBTOR	CASE NO.	EIN
Avenger Flight Group Topco, LLC	26-10182 (MFW)	99-4135643
Avenger Flight Group, LLC	26-10183 (MFW)	46-1371216
AFG Dallas III, LLC	26-10184 (MFW)	85-1245615
AFG Dallas IV, LLC	26-10185 (MFW)	87-1435558
AFG Dallas, LLC	26-10186 (MFW)	81-2473418
AFG EU Operations Corp.	26-10187 (MFW)	93-2799406
AFG FLL, LLC	26-10188 (MFW)	92-1346470
AFG Latam Holding Corp.	26-10189 (MFW)	83-0606475
AFG Latam Sim Holdings II, LLC	26-10190 (MFW)	83-3470473
AFG Latam Sim Holdings III, LLC	26-10191 (MFW)	83-4262592
AFG Latam Sim Holdings IV, LLC	26-10192 (MFW)	83-4500093
AFG Latam Sim Holdings, LLC	26-10193 (MFW)	83-0606475
AFG Latam, LLC	26-10194 (MFW)	82-4819545
AFG Mexico Corp.	26-10195 (MFW)	84-2731402
AFG Orlando, LLC	26-10196 (MFW)	87-1558409
AFG Sanford, LLC	26-10197 (MFW)	87-3226661
AFG Sim Holding Corp.	26-10198 (MFW)	84-2483325

¹ The Debtors in these chapter 11 cases and the last four digits of their respective federal tax identification numbers are: Avenger Flight Group, LLC (1216); AFG Dallas III, LLC (5615); AFG Dallas IV, LLC (5558); AFG Dallas, LLC (3418); AFG EU Operations Corp. (9406); AFG FLL, LLC (6470); AFG Latam Holding Corp. (6475); AFG Latam Sim Holdings II, LLC (0473); AFG Latam Sim Holdings III, LLC (2592); AFG Latam Sim Holdings IV, LLC (0093); AFG Latam Sim Holdings, LLC (6475); AFG Latam, LLC (9545); AFG Mexico Corp. (1402); AFG Orlando, LLC (8409); AFG Sanford, LLC (6661); AFG Sim Holding Corp. (3325); Avenger Flight Group Europe, Corp. (5908); Avenger Flight Group Topco, LLC (5643); Avenger Flight Training, LLC (5640); Avenger Flight Group Mexico II, S. de R.L. de C.V, (N/A); and Papi Flight Training, LLC (6206). The location of the Debtors' corporate headquarters and the Debtors' service address is Avenger Flight Group LLC, 1450 Lee Wagener Blvd., Fort Lauderdale, FL 33315.

Avenger Flight Group Europe, Corp.	26-10199 (MFW)	83-4375908
Avenger Flight Training, LLC	26-10200 (MFW)	47-1735640
Avenger Flight Group Mexico II, S. DE R.L. DE C.V.	26-10201 (MFW)	N/A
Papi Flight Training, LLC	26-10202 (MFW)	46-3866206

PLEASE TAKE NOTICE THAT:

On February 11 and 12, 2026 (the “Petition Date”), the above-captioned debtors and debtors in possession (the “Debtors”) filed voluntary petitions for relief under chapter 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware (the “Court”).

On [●], 2026, the Court entered an order [Docket No. __] (the “Bar Date Order”)² establishing certain dates by which parties holding prepetition claims against the Debtors must file: (a) proofs of claim (“Proofs of Claim”), including claims by governmental units, claims arising under section 503(b)(9) of the Bankruptcy Code, and Rejection Damages Claims; and (b) requests for payment of certain Administrative Claims.

For your convenience, enclosed with this notice (the “Notice”) is a Proof of Claim form, which identifies the amount, nature, and classification of your claim(s), if any, listed in the Debtors’ schedules of assets and liabilities filed in these cases (the “Schedules”). If the Debtors believe that you hold claims against more than one Debtor, you will receive multiple Proof of Claim forms, each of which will reflect the nature and amount of your claim as listed in the Schedules.

As used in this Notice, the term “entity” has the meaning given to it in section 101(15) of the Bankruptcy Code and includes all persons, estates, trusts, governmental units, and the Office of the United States Trustee for the District of Delaware. In addition, the terms “persons” and “governmental units” are defined in sections 101(41) and 101(27) of the Bankruptcy Code, respectively.

As used in this Notice, the term “claim” means, as to or against the Debtors and in accordance with section 101(5) of the Bankruptcy Code: (a) any right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (b) any right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured.

I. THE BAR DATES

The Bar Date Order establishes the following bar dates for filing Proofs of Claim in these Chapter 11 Cases (the “Bar Dates”).

- a. ***The Claims Bar Date.*** Pursuant to the Bar Date Order, except as described below, all entities holding claims against the Debtors that arose or are deemed to have arisen prior to the commencement of these cases on the Petition Date, including requests for payment pursuant to section 503(b)(9) of the Bankruptcy Code, are required to file Proofs of Claim **by April 30,**

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Bar Date Order.

2026, at 5:00 p.m., prevailing Eastern Time (the “Claims Bar Date”). The Claims Bar Date applies to all types of claims against the Debtors that arose or are deemed to have arisen prior to the Petition Date, including secured claims, unsecured priority claims, and unsecured non-priority claims; *provided* that, unless otherwise ordered by the Court, the bar date for filing claims arising from the rejection of executory contracts and unexpired leases of the Debtors shall be the later of: (a) the Claims Bar Date; or (b) 5:00 p.m. prevailing Eastern time on the date that is thirty (30) days following entry of an order approving the rejection of any executory contract or unexpired lease of the Debtors.

- b. ***The Governmental Bar Date.*** Pursuant to the Bar Date Order, all governmental units holding claims against the Debtors that arose or are deemed to have arisen prior to the commencement of these cases on the Petition Date are required to file proofs of claim **by August 11, 2026, at 5:00 p.m. prevailing Eastern Time** (the “Governmental Bar Date”). The Governmental Bar Date applies to all governmental units holding claims against the Debtors (whether secured, unsecured priority, or unsecured non-priority) that arose or are deemed to have arisen prior to the Petition Date, including, without limitation, governmental units with claims against the Debtors for unpaid taxes, whether such claims arise from prepetition tax years or periods or prepetition transactions to which the Debtors were a party.
- c. ***The Administrative Claims Bar Date.*** Pursuant to the Bar Date Order, all claimants holding Administrative Claims against the Debtors’ estates arising or deemed to be arisen on or prior to **April 14, 2026** (the “Administrative Claims Deadline”), excluding claims for fees and expenses of professionals retained in these proceedings and claims asserting priority pursuant to section 503(b)(9) of the Bankruptcy Code, are required to file a request for payment of such Administrative Claims with the Court and, if desired, a notice of hearing on such Administrative Claims, **by April 30, 2026, at 5:00 p.m. prevailing Eastern Time** (the “Administrative Claims Bar Date”).
- d. ***The Amended Schedules Bar Date.*** Pursuant to the Bar Date Order, all parties asserting claims against the Debtors’ estates that are affected by a previously unfiled Schedule, or amendment or supplement to the Schedules, are required to file Proofs of Claim so that such Proofs of Claim are actually received **by the Claims and Noticing Agent by the Amended Schedules Bar Date (i.e., by the later of: (a) the Claims Bar Date or the Governmental Bar Date, as applicable; or (b) 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days from the date on which the Debtors provide notice of such filing, amendment, or supplement).**

- e. ***The Rejection Damages Bar Date.*** Pursuant to the Bar Date Order, all parties asserting claims against the Debtors' estates arising from the Debtors' rejection of an executory contract or unexpired lease are required to file Proofs of Claim with respect to such rejection so that such Proofs of Claim are actually received **by the Claims and Noticing Agent by the Rejection Damages Bar Date (i.e., by the later of: (a) the Claims Bar Date or the Governmental Bar Date, as applicable; or (b) 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days following entry of an order approving such rejection).**

II. WHO MUST FILE A PROOF OF CLAIM OR ADMINISTRATIVE CLAIM

Except as otherwise set forth herein, the following entities holding claims against the Debtors that arose or are deemed to have arisen prior to the Petition Date **must** file Proofs of Claim or Administrative Claims on or before the applicable Bar Date:

- a. any person or entity whose claim against a Debtor is not listed in the applicable Debtor's Schedules or is listed in such Schedules as "contingent," "unliquidated," or "disputed" if such person or entity desires to participate in any of these Chapter 11 Cases or share in any distribution in any of these Chapter 11 Cases;
- b. any person or entity who believes that its claim is improperly classified in the Schedules or is listed in an incorrect amount and who desires to have its claim allowed in a different classification or amount other than that identified in the Schedules;
- c. any person or entity who believes that its prepetition claims as listed in the Schedules is not an obligation of the specific Debtor against which the claim is listed and that desires to have its claim allowed against a Debtor other than that identified in the Schedules;
- d. any person or entity who believes that its claim against a Debtor is or may be an administrative expense that arises on or prior to the Administrative Claims Deadline, excluding claims for fees and expenses of professionals retained in these proceedings and claims asserting priority pursuant to section 503(b)(9) of the Bankruptcy Code;
- e. any entity who believes that its claim against a Debtor is or may be entitled to priority under section 503(b)(9) of the Bankruptcy Code; and
- f. any person or entity who believes that its claim against a Debtor is or may be entitled to priority under 507(a)(7) of the Bankruptcy Code, including individuals with claims arising from the deposit of money in connection with the purchase of property that was not delivered or provided, and for which the individual has not received a refund of such deposit from any third party.

III. PARTIES WHO DO NOT NEED TO FILE A PROOF OF CLAIM OR ADMINISTRATIVE CLAIM

Certain parties are not required to file Proofs of Claim. However, the Court may enter one or more separate orders at a later time requiring creditors to file Proofs of Claim. If the Court does enter such an order, you will receive notice of it. The following entities holding claims that would otherwise be subject to the Bar Dates need *not* file Proofs of Claim:

- a. any person or entity who has already filed a signed Proof of Claim against the respective Debtor(s) with the Clerk of the Court or with Verita in a form substantially similar to Official Form 410;
- b. any person or entity whose claim is listed on the Schedules if: (i) the claim is *not* scheduled as any of “disputed,” “contingent,” or “unliquidated”; (ii) such person or entity agrees with the amount, nature, and priority of the claim as set forth in the Schedules; and (iii) such person or entity does not dispute that its claim is an obligation only of the specific Debtor against which the claim is listed in the Schedules;
- c. any person or entity whose claim has previously been allowed by order of the Court;
- d. any person or entity whose claim has been paid in full by the Debtors pursuant to the Bankruptcy Code or in accordance with an order of the Court;
- e. any Debtor having a claim against another Debtor;
- f. any Debtor having a claim against a Debtor affiliate;
- g. any counterparty to a non-residential real property lease that is assumed or assumed and assigned pursuant to section 365 of the Bankruptcy Code;
- h. any landlord counterparty of an executory contract of an unexpired non-real property lease where the lease has not yet been rejected as of the Claims Bar Date or Administrative Bar Date; provided that, for the avoidance of doubt, if a landlord counterparty’s lease is rejected, the deadline for filing claims established under the applicable rejection order shall apply to all claims arising under the lease in question, including Administrative Claims, and entities holding such claims shall not be required to file a Proof of Claim with respect to prepetition amounts or an Administrative Claim with respect to postpetition amounts unless and until such unexpired lease has been rejected;
- i. any person or entity holding a claim for which a separate deadline is fixed by this Court;
- j. any person or entity holding a claim for fees and expenses of professionals retained in these Chapter 11 Cases;

- k. claims of the U.S. Trustee for quarterly fees; and
- l. pursuant to paragraph 41 of the *Interim Order (I) Authorizing the Debtors to Obtain Senior Secured Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief* [Docket No. 59] or any corresponding paragraph contained in the Final Order (as defined in the Interim DIP Order), the DIP Secured Parties or any of the Prepetition Term Loan Secured Parties (as defined in the Interim DIP Order).

IV. INSTRUCTIONS FOR FILING PROOFS OF CLAIM

The following requirements shall apply with respect to filing and preparing each Proof of Claim:

- a. **Contents.** Each Proof of Claim must: (i) be written in English; (ii) include a claim amount denominated in United States dollars; (iii) conform substantially with the Proof of Claim Form provided by the Debtors or Official Form 410; and (iv) be signed by the claimant or by an authorized agent or legal representative of the claimant.
- b. **Section 503(b)(9) Claim.** Any Proof of Claim asserting a claim entitled to priority under section 503(b)(9) must also: (i) include the value of the goods delivered to and received by the Debtors in the twenty (20) days prior to the Petition Date; (ii) attach any documentation identifying the particular invoices for which the 503(b)(9) claim is being asserted; and (iii) attach documentation of any reclamation demand made to the Debtors under section 546(c) of the Bankruptcy Code (if applicable).
- c. **Section 507(a)(7) Claim.** Any Proof of Claim asserting a customer deposit claim entitled to priority under section 507(a)(7) must also include the total value of the deposit paid prior to the Petition Date and attach documentation supporting proof of the purchase.
- d. **Original Signatures Required.** Only *original* Proofs of Claim may be deemed acceptable for purposes of claims administration. Copies of Proofs of Claim or Proofs of Claim sent by facsimile or electronic mail will not be accepted.
- e. **Identification of the Debtor Entity.** Each Proof of Claim must clearly identify the Debtor against which a claim is asserted, including the individual Debtor's case number. A Proof of Claim filed under the joint administration case number or otherwise without identifying a specific Debtor will be deemed as filed only against Avenger Flight Group, LLC.
- f. **Claim Against Multiple Debtor Entities.** Unless otherwise ordered by the Court, each Proof of Claim must state a claim against *only one* Debtor and clearly indicate the Debtor against which the claim is asserted. To the extent

that more than one Debtor is listed on the Proof of Claim, such claim may be treated as if filed only against the first-listed Debtor.

- g. **Supporting Documentation.** Each Proof of Claim must include supporting documentation in accordance with Bankruptcy Rules 3001(c) and (d). However, if such documentation is voluminous, such Proof of Claim may include a summary of such documentation or an explanation as to why such documentation is not available; *provided* that any creditor that includes a summary shall be required to transmit such documentation to the Debtors' counsel upon request no later than ten days from the date of such request.
- h. **Timely Service.** Each Proof of Claim must be filed, including supporting documentation, so as to be **actually received** by Verita on or before the applicable Bar Date (or, where applicable, on or before any other bar date established by order of the Court), either: (1) electronically at <https://www.veritaglobal.net/AvengerFG>; or (2) by first-class or overnight U.S. mail, or by other hand delivery system, at the following address:

**Avenger Flight Group Claims Processing Center
c/o KCC dba Verita
222 N. Pacific Coast Highway, Suite 300
El Segundo, CA 90245**

PROOFS OF CLAIM SUBMITTED BY FACSIMILE OR ELECTRONIC MAIL WILL NOT BE ACCEPTED.

- i. **Receipt of Service.** Claimants wishing to receive acknowledgment that their Proofs of Claim were received by Verita must submit: (i) a copy of the Proof of Claim Form (in addition to the original Proof of Claim Form sent to Verita); and (ii) a self-addressed, stamped envelope.

V. INSTRUCTIONS FOR FILING REQUESTS FOR PAYMENT OF ADMINISTRATIVE CLAIMS

Each request for the payment of an Administrative Claim must: (i) be written in English; (ii) include a claim amount denominated in United States dollars; and (iii) be signed by the claimant or by an authorized agent or legal representative of the claimant. Each request for payment of an Administrative Claim must provide the basis for the claim and, if applicable, include supporting documentation. If such documentation is voluminous, each such request may include a summary of such documentation or an explanation as to why such documentation is not available.

Requests for payment of Administrative Claims must be in writing and filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Third Floor, Wilmington, Delaware 19801 **so as to be received on or before April 30, 2026, at 5:00 p.m. (prevailing Eastern Time)**. Requests for payment of Administrative Claims may, but are not required to, include a notice of hearing on such Administrative Claim. If you wish to include a notice of hearing, you must first obtain a hearing date from the Court.

**VI. CONSEQUENCES OF FAILING TO FILE TIMELY
YOUR PROOF OF CLAIM OR ADMINISTRATIVE CLAIM**

Pursuant to the Bar Date Order and in accordance with Bankruptcy Rule 3003(c)(2), if you or any party or entity is required, but fails, to file a Proof of Claim or Administrative Claim in accordance with the Bar Date order on or before the applicable Bar Date, please be advised that:

- a. YOU WILL BE FOREVER BARRED, ESTOPPED, AND ENJOINED FROM ASSERTING SUCH CLAIM AGAINST THE DEBTORS (OR FILING A PROOF OF CLAIM WITH RESPECT THERETO);
- b. THE DEBTORS AND THEIR PROPERTY SHALL BE FOREVER DISCHARGED FROM ANY AND ALL INDEBTEDNESS OR LIABILITY WITH RESPECT TO OR ARISING FROM SUCH CLAIM;
- c. YOU WILL NOT RECEIVE ANY DISTRIBUTION IN THESE CHAPTER 11 CASES ON ACCOUNT OF SUCH CLAIM; AND
- d. YOU WILL NOT BE PERMITTED TO VOTE ON ANY CHAPTER 11 PLAN OR PLANS FOR THE DEBTORS ON ACCOUNT OF SUCH CLAIM OR RECEIVE FURTHER NOTICES REGARDING SUCH CLAIM.

VII. AMENDMENTS TO THE DEBTORS' SCHEDULES

If, subsequent to the date of this Notice, the Debtors amend or supplement their Schedules to reduce the undisputed, noncontingent, and liquidated amount of a claim listed in the Schedules, to change the nature or classification of a claim against the Debtors reflected in the Schedules, or to add a new claim to the Schedules, the affected creditor is required to file a Proof of Claim or amend any previously-filed Proof of Claim in respect of the amended scheduled claim on or before the later of: (a) the Claims Bar Date or the Governmental Bar Date, as applicable to such claim; and (b) 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days after the date that on which the Debtors provide notice of the amendment to the Schedules (or another time period as may be fixed by the Court) (any such date, an "Amended Schedules Bar Date").

VIII. RESERVATION OF RIGHTS

Nothing contained in this Notice is intended to or should be construed as a waiver of the Debtors' right to: (a) dispute, or assert offsets or defenses against, any filed claim or any claim listed or reflected in the Schedules as to the nature, amount, liability, or classification thereof; (b) designate subsequently any scheduled claim as disputed, contingent, or unliquidated; and (c) amend or supplement the Schedules otherwise.

IX. THE DEBTORS' SCHEDULES AND ACCESS THERETO

You may be listed as the holder of a claim against one or more of the Debtor entities in the Debtors' Schedules. To determine if and how you are listed on the Schedules, please refer to the descriptions set forth on the enclosed Proof of Claim forms regarding the nature, amount, and status of your claim(s). If

the Debtors believe that you may hold claims against more than one Debtor entity, you will receive multiple Proof of Claim forms, each of which will reflect the nature and amount of your claim against one Debtor entity, as listed in the Schedules.

If you rely on the Debtors' Schedules, it is your responsibility to determine that the claim is accurately listed in the Schedules. However, you may rely on the enclosed form, which sets forth: (a) the amount of your claim (if any) as scheduled; (b) the identity of the Debtor entity against which your claim is scheduled; (c) whether your claim is listed in the Schedules as "contingent," "unliquidated," or "disputed"; and (d) whether your claim is scheduled as a secured, unsecured priority, or unsecured non-priority claim.

As described above, if you agree with the nature, amount, and status of your claim as listed in the Debtors' Schedules, and if you do not dispute that your claim is only against the Debtor entity specified by the Debtors, and if your claim is not described as "disputed," "contingent," or "unliquidated," you need *not* file a Proof of Claim. Otherwise, or if you decide to file a Proof of Claim, you must do so before the applicable Bar Date in accordance with the procedures set forth in this Notice.

X. ADDITIONAL INFORMATION

Copies of the Debtors' Schedules, the Bar Date Order, and other information regarding these Chapter 11 Cases are available for inspection free of charge on Verita's case website at <https://www.veritaglobal.net/avengerfg>. The Schedules and other filings in these Chapter 11 Cases are also available for a fee at the Court's website at <https://www.deb.uscourts.gov>. A login identification and password to the Court's Public Access to Court Electronic Records ("PACER") are required to access this information and can be obtained through the PACER Service Center at <https://pacer.uscourts.gov>. Copies of the Schedules and other documents filed in these cases also may be examined between the hours of 9:00 a.m. and 4:30 p.m., prevailing Eastern Time, Monday through Friday, at the office of the Clerk of the Bankruptcy Court, United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801.

If you require additional information regarding the filing of a proof of claim, or a request for payment of an administrative claim, you may contact the Debtors' notice and claims agent, Verita, directly by writing to: 222 N. Pacific Coast Highway, Suite 300, El Segundo, CA 90245, or by contacting the Debtors' information line at (877) 725-7534 (U.S./Canada) or +1 (424) 236-7234 (International), or by submitting an inquiry at <https://www.veritaglobal.net/avengerfg/inquiry>.

<p>A HOLDER OF A POSSIBLE CLAIM AGAINST THE DEBTORS SHOULD CONSULT AN ATTORNEY REGARDING ANY MATTERS NOT COVERED BY THIS NOTICE, SUCH AS WHETHER THE HOLDER SHOULD FILE A PROOF OF CLAIM.</p>

Dated: March __, 2026

PACHULSKI STANG ZIEHL & JONES LLP

/s/ DRAFT

Richard M. Pachulski, Esq. (admitted *pro hac vice*)

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Proposed Counsel to the Debtors and Debtors in Possession

EXHIBIT D

Publication Notice

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AVENGER FLIGHT GROUP, LLC, *et al.*,

Debtors.¹

Chapter 11

Case No. 26-10183 (MFW)

(Jointly Administered)

**NOTICE OF DEADLINES FOR THE FILING OF:
(I) PROOFS OF CLAIM, INCLUDING REQUESTS FOR PAYMENT
PURSUANT TO SECTION 503(b)(9) OF THE BANKRUPTCY CODE;
(II) ADMINISTRATIVE CLAIMS; AND (III) REJECTION DAMAGES CLAIMS**

**THE CLAIMS BAR DATE AND ADMINISTRATIVE CLAIM BAR DATE ARE APRIL
30, 2026, AT 5:00 P.M. EASTERN TIME.
THE GOVERNMENTAL BAR DATE IS AUGUST 11, 2026, AT 5:00 P.M. EASTERN
TIME.**

PLEASE TAKE NOTICE OF THE FOLLOWING:

Deadlines for Filing Proofs of Claim and Administrative Claims Arising Prior to the Administrative Claim Deadline. On [●], 2026, the United States Bankruptcy Court for the District of Delaware (the “Court”) entered an order [Docket No. ___] (the “Bar Date Order”) establishing certain dates by which parties holding prepetition claims against the above-captioned debtors and debtors in possession (collectively, the “Debtors”) must file: (a) proofs of claim (“Proofs of Claim”), including claims by governmental units, claims arising under section 503(b)(9) of the Bankruptcy Code, and Rejection Damages Claims; and (b) requests for payment of Administrative Claims (as defined herein) arising on or prior to the Administrative Claims Deadline (as defined herein) in the Debtors’ Chapter 11 Cases.

The Bar Dates. Pursuant to the Bar Date Order, *all* entities (except governmental units), including individuals, partnerships, corporations, joint ventures, estates, and trusts, who have a claim or potential claim against the Debtors that arose or is deemed to have arisen prior to February 11, 2025, no matter how remote or contingent such right to payment or equitable remedy may be,

¹ The Debtors in these chapter 11 cases and the last four digits of their respective federal tax identification numbers are: Avenger Flight Group, LLC (1216); AFG Dallas III, LLC (5615); AFG Dallas IV, LLC (5558); AFG Dallas, LLC (3418); AFG EU Operations Corp. (9406); AFG FLL, LLC (6470); AFG Latam Holding Corp. (6475); AFG Latam Sim Holdings II, LLC (0473); AFG Latam Sim Holdings III, LLC (2592); AFG Latam Sim Holdings IV, LLC (0093); AFG Latam Sim Holdings, LLC (6475); AFG Latam, LLC (9545); AFG Mexico Corp. (1402); AFG Orlando, LLC (8409); AFG Sanford, LLC (6661); AFG Sim Holding Corp. (3325); Avenger Flight Group Europe, Corp. (5908); Avenger Flight Group Topco, LLC (5643); Avenger Flight Training, LLC (5640); Avenger Flight Group Mexico II, S. de R.L. de C.V, (N/A); and Papi Flight Training, LLC (6206). The location of the Debtors’ corporate headquarters and the Debtors’ service address is Avenger Flight Group LLC, 1450 Lee Wagener Blvd., Fort Lauderdale, FL 33315.

including requests for payment under section 503(b)(9) of the Bankruptcy Code, **MUST FILE A PROOF OF CLAIM** on or before **April 30, 2026, at 5:00 p.m. prevailing Eastern Time** (the “Claims Bar Date”). Governmental units who have a claim or potential claim against the Debtors that arose or is deemed to have arisen prior to the Petition Date, no matter how remote or contingent such right to payment or equitable remedy may be, **MUST FILE A PROOF OF CLAIM** on or before **August 11, 2026, at 5:00 p.m. prevailing Eastern Time** (the “Governmental Bar Date”).

Administrative Claims Bar Date. Parties asserting Administrative Claims against the Debtors’ estates arising or deemed to have arisen on or prior to April 14, 2026 (the “Administrative Claims Deadline”) (but excluding claims for fees and expenses of professionals retained in these proceedings and claims asserting priority pursuant to section 503(b)(9) of the Bankruptcy Code) are required to file a request for payment of such Administrative Claims arising or deemed to have arisen on or prior to the Administrative Claims Deadline with the Court on or before **April 30, 2026, at 5:00 p.m. prevailing Eastern Time** (the “Administrative Claims Bar Date”).

Amended Schedules Bar Date. All parties asserting claims against the Debtors’ estates that are affected by a previously unfiled Schedule, or an amendment or supplement to the Schedules, are required to file Proofs of Claim by **the later of: (a) the Claims Bar Date or the Governmental Bar Date, as applicable; or (b) 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days from the date on which the Debtors provide notice of a previously unfiled Schedule, or an amendment or supplement to the Schedules** (the “Amended Schedules Bar Date”).

Rejection Damages Bar Date. All parties asserting claims against the Debtors’ estates arising from the Debtors’ rejection of an executory contract or unexpired lease must file a Proof of Claim by **the later of: (a) the Claims Bar Date or the Governmental Bar Date, as applicable; or (b) 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days following entry of an order approving such rejection** (the “Rejection Damages Bar Date”).

ANY PERSON OR ENTITY WHO FAILS TO FILE A PROOF OF CLAIM, INCLUDING ANY REQUEST FOR PAYMENT UNDER SECTION 503(b)(9) OF THE BANKRUPTCY CODE, OR WHO FAILS TO FILE WITH THE COURT AN ADMINISTRATIVE CLAIM ARISING OR DEEMED TO HAVE ARISEN ON OR PRIOR TO THE ADMINISTRATIVE CLAIMS DEADLINE, IN EACH CASE ON OR BEFORE THE APPLICABLE BAR DATE, SHALL NOT BE TREATED AS A CREDITOR WITH RESPECT TO SUCH CLAIM FOR THE PURPOSES OF VOTING AND DISTRIBUTION ON ANY CHAPTER 11 PLAN.

Filing a Proof of Claim. Each Proof of Claim must be filed, including supporting documentation, so as to be ***actually received*** by Verita on or before the applicable Bar Date or, where applicable, on or before any other bar date established by order of the Court), either: (1) electronically at <https://www.veritaglobal.net/AvengerFG>; or (2) by first-class or overnight U.S. mail, or by other hand delivery system, at the following address:

**Avenger Claims Processing Center
c/o KCC dba Verita
222 N. Pacific Coast Highway, Suite 300
El Segundo, CA 90245**

Contents of Proofs of Claim. Each Proof of Claim must: (i) be written in English; (ii) include a claim amount denominated in United States dollars; (iii) conform substantially with the Proof of Claim Form provided by the Debtors or Official Form 410; and (iv) be signed by the claimant or by an authorized agent or legal representative of the claimant.

Section 503(b)(9) Requests for Payment. Any Proof of Claim asserting a claim entitled to priority under section 503(b)(9) must also: (i) include the value of the goods delivered to and received by the Debtors in the twenty (20) days prior to the Petition Date; (ii) attach any documentation identifying the particular invoices for which the section 503(b)(9) claim is being asserted; and (iii) attach documentation of any reclamation demand made to the Debtors under section 546(c) of the Bankruptcy Code (if applicable).

Section 507(a)(7) Claim. Any Proof of Claim asserting a customer deposit claim entitled to priority under section 507(a)(7) must also include the total value of the deposit paid prior to the Petition Date and attach documentation supporting proof of the purchase.

Additional Information. If you require additional information regarding the filing of a proof of claim, you may contact the Debtors' notice and claims agent, Verita, directly by writing to: 222 N. Pacific Coast Highway, Suite 300, El Segundo, CA 90245, or by contacting the Debtors' information line at (877) 725-7534 (U.S./Canada) or +1 (424) 236-7234 (International), or by submitting an inquiry at <https://www.veritaglobal.net/avengerfg/inquiry>.

Claim Against Multiple Debtor Entities. Unless otherwise ordered by the Court, each Proof of Claim must state a claim against *only one* Debtor and clearly indicate the Debtor against which the claim is asserted. To the extent that more than one Debtor is listed on the Proof of Claim, such claim may be treated as if filed only against the first-listed Debtor.

Supporting Documentation. Each Proof of Claim must include supporting documentation in accordance with Bankruptcy Rules 3001(c) and (d). However, if such documentation is voluminous, such Proof of Claim may include a summary of such documentation or an explanation as to why such documentation is not available; *provided* that any creditor that includes a summary shall be required to transmit such documentation to the Debtors' counsel upon request no later than ten days from the date of such request.

Receipt of Service. Claimants wishing to receive acknowledgment that their Proofs of Claim were received by Verita must submit: (i) a copy of the Proof of Claim Form (in addition to the original Proof of Claim Form sent to Verita); and (ii) a self-addressed, stamped envelope.

Dated: March __, 2026

PACHULSKI STANG ZIEHL & JONES LLP

/s/ DRAFT

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Proposed Counsel to the Debtors and Debtors in Possession